

# Modern Slavery Policy Statement

Blancomet Recycling UK Ltd continually works to prevent slavery and human trafficking from taking place in our operations, in line with the United Kingdom Modern Slavery Act.

## Our Business

Blancomet Recycling UK Ltd is committed to improving the working conditions of people around the world who are a part of our supply chain and business. Blancomet Recycling UK Ltd sources products and services for many of its businesses around the Europe. With manufacturers and service providers spanning the Europe, we recognise the need to monitor for conditions that put workers at risk of forced labour.

## Policies and Controls

Blancomet Recycling UK Ltd.'s internal Code of Business Conduct and Ethics sets out guiding principles and establishes that in performing job duties Blancomet Recycling UK Ltd employees should always act lawfully, ethically, and in the best interests of Blancomet Recycling UK Ltd.

Blancomet Recycling UK Ltd commits publicly to addressing risk of slavery and human trafficking in its Supplier Code of Conduct.

Company purchase and service agreements require our manufacturing suppliers and service providers supporting Company's internal operations to comply with our Supplier Code of Conduct.

We evaluate and address risks of slavery and human trafficking in the Supplier Code which states, among other standards, that:

- Our suppliers must not use forced labour - slave, prison, indentured, bonded, or otherwise.
- Our suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Working must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice.
- Workers shall not be required to pay recruitment, hiring, or other similar fees related to their employment; our suppliers must bear or reimburse to their workers the cost of any such fees. All fees and expenses charged to workers must be disclosed to Blancomet Recycling UK Ltd and communicated to workers in their native language in advance of employment.
- Our suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working, and our suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing.
- Workers must be given clear, understandable contracts regarding the terms and conditions of their engagement in a language understood by the worker.
- Suppliers must ensure that each of its staffing or recruiting agencies comply with this Supplier Code and with the more stringent of the applicable laws of the country where work is performed and the worker's home country.

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## Due Diligence Processes

Company assesses all suppliers and service providers for continued compliance and improvement. Blancomet Recycling UK Ltd uses a risk-based approach to determine the frequency of assessments and which suppliers and service providers should be assessed. Company may terminate its relationships with any supplier that violates our Supplier Code or does not cooperate during assessments. Assessments may include:

- Site inspection of all areas of the site and any living quarters;
- Confidential worker interviews or surveys conducted without site management present;
- Review and analysis of site documents or licenses to assess workers' age, contracts, compensation, working hours, and workplace conditions;
- Identification of past compliance issues, areas for improvement, and development of a remediation plan.

Suppliers are required to remediate violations of Blancomet Recycling UK Ltd Supplier Code of Conduct. Suppliers must submit a Corrective Action Plan (CAP) providing both a root cause analysis and a description of remedy. Company evaluates CAPs in light of the severity level of the violation.

## Risk Management

To ensure that our policies and programs incorporate internationally recognised human rights standards, we conduct formal benchmarking with industry and multilateral groups to design, operate, and continually improve our risk assessment and audit program.

Blancomet Recycling UK Ltd aligns with industry associations to collaborate on key issues and leverages their standardised assessments.

## Signed by

Company Director



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Version history						
Version No.	Date	Section	Page	Summary of changes	Reviewed By	Approved By
01	June 2020	-	-	New Document	J Zenevicius	Blancomet
02	June 2024			No change	J Zenevicius	Blancomet