	Policy Documents		
	DOCUMENT TITLE:	Modern Slavery Policy	Code: WI00
	WRITTEN BY:	Sarah Davies	Issue Number : 1
	APPROVED BY:	Compliance & Technical Manager	
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1. OBJECTIVE

1.1 To ensure the company has a Modern Slavery Policy. This enables the business to sustain continuity and maintain its responsibilities.

2. RESPONSIBILITY

2.1 Senior Management Team
Operations Director, Compliance & Technical Manager, Business Manager and Contracts & Operations Manager

3. ASSOCIATED DOCUMENTS

3.1 Corporate Social Responsibility Policy
3.2 Handbook of Business Procedures
3.3 Health, Safety & Welfare Policy

4. METHOD

Modern Slavery Policy

Policy Brief and purpose

We are committed to improving our practices to combat slavery and human trafficking within our supply chain. This statement sets out the steps that N-Virocycle have taken and will be taking to ensure that slavery and human trafficking is not taking place in any part of our business, or that of our supply chain.

Scope

The policy applies to our company and its subsidiaries. It may also refer to suppliers and partners.


Policy Elements

Organisational structure:

We are a provider of Recycling Services in the Waste Management Sector. Our company N-Virocycle Ltd has over 36 employees and operates in UK. We have an annual turnover of £xxx.

Our Business

Our supply chains include: Agricultural specialists in the farm industry, Main dealer service providers, 3rd Party Hauliers, Specialist Driving Agencies and various small parts and consumable suppliers

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Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships. To implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier Adherence to our Values & Ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a supply chain compliance programme. This consists of an annual review of all suppliers covering goods and/or services they provide. We have a dedicated Compliance & Technical Manager who completes internal and external audits on all procedures whilst monitoring and evaluating services or goods provided ensuring they are effective in countering modern slavery.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.


Our effectiveness in combating Slavery and Human Trafficking

Our Compliance & Technical Manager conducts internal reviews to bring insights into ways to tackle slavery and human trafficking. We use key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

Further Steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- When initially taking on a new supplier we will issue a new supplier form which will evaluate the suppliers performance and policies.
- We will review this annually within our internal audit programme.
- We will Incorporate our equal opportunities, whistle blower, Health, Safety and welfare policies.

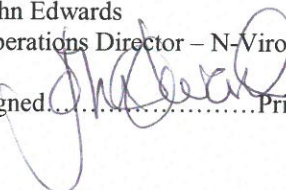
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This statement is made to section 54(1) of the Modern Slavery Act 2015 and constitutes our companies slavery and human trafficking statement for the financial year ending 2018

5. REVISION SUMMARY

5.1 First Issue

John Edwards
Operations Director – N-Virocycle Ltd

Signed  Print Name JEOWARDS Date approved 25/5/18 Review Date 24/5/19

Slavery Policy Statement

1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically with integrity in all our business dealings and relationships. Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time

2. RESPONSIBILITY FOR THE POLICY

2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

2.2 The Compliance & Technical Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Manager.

3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your Manager or the Compliance & Technical Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager, report it in accordance with our Whistleblowing Policy as soon as possible.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your Manager or Compliance & Technical Manager

3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the company handbook on Octopus HR.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

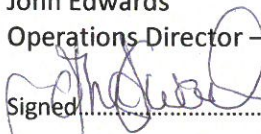
4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

John Edwards
Operations Director – N-Virocycle Ltd

Signed  Print Name JEEDWARDS Date approved 25/5/18 Review Date 24/5/19