



## **ANTI-SLAVERY & HUMAN TRAFFICKING POLICY**

Highlander International Recycling take a zero tolerance approach to any form of modern slavery which encompasses slavery, servitude, human trafficking and forced labour. We are committed to acting ethically, with integrity and transparency in all business dealings, ensuring effective systems and controls are in place to safeguard against any form of modern slavery taking place within our business operations or in our supply chain.

The Company acknowledges the Modern Slavery Act 2015 and we accept the responsibility to ensure that workers are not being exploited, and that relevant employment, health & safety, and human rights laws and standards are being adhered to, including freedom of movement and communication.

We operate a supplier approval process which includes consideration of any risks of modern slavery or human trafficking. All approved suppliers are required to demonstrate they meet our requirements to ensure that slavery, and human trafficking is not taking place within their organisation. We will not have any dealings with any business knowingly involved in slavery or human trafficking.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our ISO compliant Management Systems. The implementation and operation of this management system underlines our commitment to this policy, including procedures to ensure that this policy, as well as all other company policies, are available and understood at all staff levels.

This will be reviewed annually to ensure its continuing suitability and relevance to company activities, and is made available to all interested parties upon request. Any concerns about any form of modern slavery taking place within our business or supply chain should be reported to management.

**Signed May 2019**  
**Joint Managing Directors**

**Brian Bingham**

**Stephen Duffy**