

SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021

This statement outlines the steps we have taken in the last twelve months to combat the risk of modern slavery and human trafficking taking place in either our business or our supply chains, and our focus for the week ahead.

This is our first statement published in accordance with Section 54 of the Modern Slavery Act 2015 and applies to Cumbria County Holding Limited (CCH Group).

BACKGROUND:

Modern slavery is a crime and violation of fundamental human rights. It is a term used to encompass slavery, forced and compulsory labour, child labour and human trafficking. We are committed to tackling modern slavery, both in terms of our own business operations and within our supply chain.

BUSINESS, ORGANISATION STRUCTURE AND SUPPLY CHAIN:

CCH Group is the collective trading name for two operating groups of subsidiary companies, The Cumbria Waste Group (CWG) and Orian Solutions Group (Orian) operating in waste management and soft facilities management sectors. The Head Office is based in Carlisle and provides support to 1800 people on numerous sites throughout Cumbria and the North of England.

Our business is underpinned by our values, which is reflected in the inclusive behaviours that we want to be known for. We run our business with integrity and act responsibly to make CCH Group a great place to work and to do business with.

We are committed to reduce carbon footprint and procure locally wherever possible, rationalising our supplier base and reducing our distribution network. Our commitment to quality assurance across the business coupled with the close working relationship with our suppliers has enabled legislative compliance, quality accreditation and the adoption of safe working practices.

POLICIES ON MODERN SLAVERY:

Our values and behaviours guide our actions and behaviours with clear expectations set out in policies which are available to all employees internally.

We have a number of policies and procedures in place that reflect the way we do business and set out expectations to all our employees. These policies visibly reflect our commitment to responsible business policies and practices that are fair, transparent, and inclusive. These include.

- Anti-Bribery
- Whistleblowing
- Equality and Diversity
- Dignity at Work
- Flexible working policy
- Maternity, Paternity, Adoption, Parental Leave and Shared Parental Leave

- Recruitment and selection
- Safeguarding

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from abuse or coercion.

During the year, our focus has been on implementing important changes to support the health and wellbeing of our employees in response to the COVID-19 pandemic, including.

- Conducting our COVID-19 risk assessment and communicating our steps for safer working.
- Introducing safeguarding measures such as social distancing and provision of Personal Protective Equipment

We are committed to maintaining an open culture with the highest standards of honesty and accountability, a culture where colleagues can report any legitimate concerns in confidence. Our Whistleblowing policy outline the process to raise a concern about wrongdoing, safe in the knowledge that it will be investigated promptly and effectively. We undertake to protect our people from any victimisation, harassment or bullying which may result from disclosure.

In the last 12 months we had no reported incidents of slavery or trafficking in our operations.

MANAGING OUR SUPPLY CHAIN:

Expectations of suppliers are grouped into the following key areas:

- *Health and Safety*
- *Equality and Diversity*
- *Business Integrity*
- *Environment Management*

To help make more informed purchasing decisions, sustainability risk criteria and employment practices are fully integrated into sourcing process. We have developed a risk-based approach to supplier categorisation of goods and services, which will be reinforced to include a modern slavery supplier statement thus expanding due diligence for suppliers.

All CCH Group suppliers will be expected to implement a zero-tolerance approach to slavery, forced labour and human trafficking and comply with all local and national laws and regulations.

We identify trustworthy suppliers who have the same ethical practices. Each supplier compliance is assessed through a suite of due diligence checks, which includes a statement of compliance with our Offtaker/Contractor questionnaire. This assists with identifying potential areas of risk within the supply chain and ethical trading.

If a supplier provides a non-compliance answer to our questionnaire, we will act upon it, and – when it is considered appropriate – work collaboratively with our suppliers/contractors to develop corrective action plans to remedy shortcomings and raise standards over time. If a supplier/contractor is unwilling or unable to address any identified actual or potential issues, or an

issue is identified as critical in nature, then CCH Limited reserve the right to take rapid and emphatic steps which could include termination of any and all agreement in existence.

Most of our direct suppliers represent a low risk of modern slavery, all existing suppliers are required to sign a statement of compliance. Undertaking that they have reviewed their business operations and their supply chains for evidence of any instances of slavery, forced labour or human trafficking. If suppliers are not willing to improve their performance, despite our efforts to engage and support, we may withdraw from contracts or switch to other suppliers.

TRAINING AND AWARENESS:

- Practical checks that should be made when recruiting new employees.

STAKEHOLDER ENGAGEMENT:

We continue to collaborate with our peers, supply chains, clients and external organisation to improve our approach to understanding the potential risk of modern slavery in our own supply chains and across the industry.

CURRENT AND FUTURE PLANS:

- Continue to regularly review and improve our supplier risk assessment processes.
- Continue to engage with stakeholders to promote human rights and the prevention of modern slavery.
- Continue to develop our policies to support ethical behaviour.
- Continue to educate and promote a “speaking up” culture within our business, encouraging all of our employees or those working on our behalf to raise any concerns.
- Include modern slavery training on our mandated training package.

Ultimately, there is no place for modern slavery in our business or our supply chain and we will continue to evolve the way we identify and mitigate the modern slavery and human trafficking risks.