

Modern Slavery Act 2015: Slavery and human trafficking statement.

Introduction from the Board of Directors

We are committed to improving our practices to combat slavery and human trafficking. Modern slavery is a crime and a gross 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 and with integrity in all our business dealings and relationships and to 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.

Organisation's structure

Established in 1948 we are Donald Ward Ltd t/a Ward, a Metal and Waste Recycling Company. We operate over four sites in Derbyshire and Chesterfield and employ 370 people.

We have a global annual turnover of £155 million.

Our business

Our business is split over four sites where we process Metal and waste for recycling .

Our supply chains

We have a relationship with hundreds of suppliers across the world who source materials, labour and waste for our company.

These suppliers of goods and services to our business must comply with all of the relevant legislation and codes of practice including: Health & Safety for workers, enforced labour, child labour, human rights, bribery, corruption and fraud.

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 and to implementing and enforcing 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 [and ethics]

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we send a copy of our policy before engaging our suppliers.

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].

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to ensure that any supplier contracts we enter into in the future contain relevant provisions that require the supplier(s) to comply with applicable legislation and the Modern Slavery Act 2015, to combat slavery and human trafficking.

We will provide new starters with training to understand the risk of modern slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019

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SIGNATURE:

A handwritten signature in black ink, appearing to read 'D. Ward', is written over a light green rectangular background.

Donald Ward Ltd t/a Ward

Date: 31 March 2019