

# POLICY STATEMENT



POL—HR 039  
REV 2  
FEBRUARY 2018

## MODERN SLAVERY

**William Tracey Limited is opposed to slavery and human trafficking in any part of our business or our supply chain. We are therefore committed to ensuring that we have adequate procedures in place to identify and prevent these practices.** We meet the turnover threshold applicable to section 54 of the Modern Slavery Act 2015 in respect of the period covered by this statement.

### **Our Business**

We are a recycling and resource management Company, within the environmental sector. Seasonal work is not a feature of the industry in which we operate. More information on our business is available at [www.williamtraceygroup.com](http://www.williamtraceygroup.com).

We are part of the Enva Group, a leading waste management, recycling and resource recovery business based in the UK and Ireland which is focused on the industrial, commercial, construction and public sectors, operating in the specialist hazardous and non-hazardous sectors.

### **Our Structure**

Our business is organised into two divisions containing eight business units as follows.

- Non Hazardous Division depots are Linwood, Newbridge, Glenrothes and Irvine.
- Industrial and Utilities Division depots are Paisley, Dunniflats, Middleton and Gateshead. Tracey Timber Limited operates from our Linwood base and Digit Resource Management is based in Middleton.

### **Our Supply Chains**

We only source products from reputable suppliers who are based in the UK and the European Union.

### **Our Policies on Slavery and Human Trafficking**

We are committed to acting ethically and with integrity towards our employees and in all our business relationships.

Our policy on slavery and human trafficking is set out at the commencement of this statement.

### **Procedures on Slavery and Human Trafficking**

As part of our compliance with the policies referred to above, we will take the following steps:

- Assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including by reviewing, where necessary, the controls that our suppliers have in place and carrying out other suitable checks;
- Monitor potential risk areas in our supply chains on a periodic basis.

Responsibility for ensuring that our procedures are adequate and are adhered to in all areas of our activities rests with the Directors of William Tracey Limited.

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## MODERN SLAVERY Cont.

### Training

To ensure a suitable level of understanding of the risks of modern slavery, and human trafficking, in our business, and our supply chains, relevant Directors and employees will participate in workshops, over the course of the financial year ending March 2019.

### Assurance and Key Performance Indicators

We will review this policy on an annual basis, developing appropriate key performance indicators, to measure compliance.

A handwritten signature in blue ink that reads "Tom Walsh".

**Tom Walsh**  
CEO ENVA GROUP

A handwritten signature in blue ink that reads "Graeme McDonald".

**Graeme McDonald**  
MANAGING DIRECTOR  
INDUSTRIAL & UTILITIES DIVISION