

# POLICY STATEMENT



POL—HR 039  
ISSUE A (SEPT 2016)  
REVISION 0

## 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 a part of the DCC Group. DCC is an international sales, marketing, distribution and business support services group. Its headquarters are in Dublin, Ireland and it is listed on the London Stock Exchange. DCC currently has operations in 14 countries and employs over 11,000 people. More information on the DCC Group is available at [www.dcc.ie](http://www.dcc.ie).

### **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**

The DCC Group *Business Conduct Guidelines* set out our Group commitment to acting ethically and with integrity towards our employees and in all our business relationships. In addition, the DCC Group *Supply Chain Integrity Policy* sets out the approach taken by every business in the DCC Group to ensuring that all the products we sell meet applicable legal and ethical standards. Both of these documents are available at <http://www.dcc.ie/sustainability/our-policies.aspx>.

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

The requirements of our Group *Business Conduct Guidelines*, Group *Supply Chain Integrity Policy* and our own policy are reflected in the more detailed policies and procedures that we have in William Tracey Limited.

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## MODERN SLAVERY Cont.

### 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.

### 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 in our business will participate in workshops with other businesses in the DCC Group over the course of financial year ending 31 March 2017.

### Assurance and Key Performance Indicators

We report on compliance with the DCC Group *Business Conduct Guidelines* and *Supply Chain Integrity Policy* every six months. We will review this policy on an annual basis.

We will develop and monitor suitable key performance indicators to measure our compliance with our Group and internal policies in this area.

A handwritten signature in blue ink that reads "Michael Tracey".

**Michael Tracey**  
GROUP MANAGING DIRECTOR