




Modern Slavery & Human Trafficking Statement - 2019

Policy Number	HR26	Version	V4
Issue date	17 th April 2019	Review date	17 April 2020
Author(s)	Jacky Smith (HR Manager)		
Contributor(s)	N/A		
Approved on behalf of the Board by:		Stuart Butler-Gallie, Director of Compliance	

Introduction

Countrystyle Recycling Ltd (Countrystyle) is committed to driving out acts of modern day slavery from within its own business and that within its supply chains. Countrystyle acknowledges its responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the company.

This statement sets out Countrystyle's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Organisation structure and supply chains

Countrystyle is led by a team of Directors, supported by senior and middle management, working across a variety of disciplines.

Countrystyle is a Kent-based resource management and recycling specialist delivering a range of specialised resource management services to both private and public sector clients across Kent and the South East of England. Countrystyle provides services for the recycling of plasterboard, cardboard, plastics, waste wood and the manufacture of refuse-derived fuel and sustainable peat-free compost.

Within its supply chain there are relationships with external businesses for the sourcing of waste products. These, as well as the suppliers of services and equipment, make up the supply chains within Countrystyle.

Policy on modern slavery

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Modern Slavery and Human Trafficking Statement which reflects our commitment to acting ethically and with integrity in all our business relationships and to enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.
2. Recruitment policy. We operate a strong recruitment policy, including conducting right to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.



3. Whistleblowing policy. We operate a whistleblowing policy that encourages employees to report any wrongdoing as soon as possible with the knowledge that their concerns will be taken seriously and confidentiality will be respected.
4. Code of conduct. This code explains the manner in which we behave as an organisation and how we expect employees to act.

Due Diligence Process

Countrystyle undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. As part of its due diligence processes into slavery and human trafficking, the supplier approval process and subsequent audits will incorporate a review of the controls undertaken by the supplier. Imported products from sources from outside the UK and EU are potentially more at risk for slavery and human trafficking issues. The level of management control required for these sources will be continually monitored.

Risk Assessment

We have in place a risk management process that identifies, assesses, monitors and reports on the Company's compliance risks.

Measuring Effectiveness

We will know the effectiveness of the steps that we are taking to ensure slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

Training for staff

The company Directors and senior management team have been assigned the responsibility for implementing this policy statement and its objectives, and will provide adequate resources, training and investment to ensure that slavery and human trafficking is not taking place within the company or within its supply chains.

All managers at Countrystyle are issued with a Managers' Guide to Modern Slavery and a computer based training session. All staff are required to sign their acceptance and understanding of this policy.