



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to Modern Slavery Act 2015 section 54 and sets out the steps RED Industries Group has taken during the financial year ending March 2026 to prevent modern slavery and human trafficking within our business and supply chains.

Our Commitment

RED Industries operates a zero-tolerance approach to modern slavery, human trafficking, forced labour and exploitation.

We are committed to acting ethically, transparently and with integrity in all business dealings and relationships. We recognise that risks can arise within operational environments, labour supply and wider supply chains, and we take a proactive approach to identifying and managing those risks.

Organisational Structure

Group Structure

RED Industries forms part of the Oliver Grace Group, which is the ultimate parent company.

The following entities operate within RED Industries Group in the UK:

- Red Industries (Stoke) Ltd – Sneyd Hill Facility
- Red Industries (Brownhills) Ltd – Brownhills Facility
- Red Industries IS Ltd – Wednesbury Facility

This statement applies to all entities within RED Industries Group.

Operations and Supply Chain

RED Industries is a waste management and environmental services provider operating across the UK.

Our core operations include:

- Waste treatment and transfer facilities
- Industrial cleaning services
- Environmental and logistics support

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Our supply chain includes:

- Recruitment agencies and labour providers
- Logistics and transport providers
- Equipment and parts suppliers
- Waste processing partners and subcontractors

We require all suppliers and contractors to comply with UK legal requirements and ethical labour standards as a condition of doing business with RED Industries. We do not knowingly engage with organisations involved in slavery, servitude, forced or compulsory labour. Any concerns identified are subject to immediate review and may result in termination of the relationship.

Policies and Governance

We maintain policies and procedures that support ethical working practices and reduce the risk of modern slavery, including:

- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Anti-Bribery and Corruption Policy
- Grievance Policy
- Recruitment and Right to Work Procedures

These policies are regularly reviewed and accessible to all employees.

Employees are encouraged to raise concerns at the earliest opportunity. Reports can be made via management channels or in line with the Whistleblowing Policy. Concerns are treated seriously and investigated appropriately. Where concerns are substantiated, appropriate action is taken, which may include supplier disengagement, internal disciplinary action or escalation to relevant authorities.

Due Diligence and Risk Management

We take a risk-based approach, focusing on areas where the potential for modern slavery is higher, including:

- Agency and temporary labour
- Lower-skilled operational roles
- External suppliers and subcontractors

Particular focus is placed on labour providers and recruitment agencies due to the higher inherent risk associated with third-party labour supply.

This includes risks associated with human trafficking within labour supply chains.

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Controls in place include:

- Verification of all employees' right to work in the UK
- Identity checks, referencing and secure payroll practices
- Engagement with approved and reputable recruitment agencies
- Supplier onboarding checks and ongoing review through purchasing procedures
- Periodic supplier audits where appropriate

Our purchasing procedures include checks on supplier suitability, formal approval processes and periodic review.

Where appropriate, contractual terms include requirements relating to legal compliance, ethical labour standards and the right to review supplier practices.

We recognise that audits alone are not sufficient and continue to strengthen our due diligence through increased supplier engagement and transparency.

Training and Awareness

All employees receive modern slavery awareness training as part of their onboarding. Refresher training is provided where appropriate.

Training supports employees to:

- Recognise indicators of modern slavery and exploitation
- Understand reporting routes
- Act appropriately where concerns arise

Managers are responsible for reinforcing awareness within their teams and ensuring concerns are escalated.

Effectiveness and Monitoring

We monitor the effectiveness of our approach through:

- Completion rates of modern slavery training
- Supplier due diligence activity, including reviews and audits
- Any reported concerns and how these are investigated and resolved
- Ongoing review of recruitment and labour supply practices

During the reporting period, no instances of modern slavery were identified within our business.

We recognise the importance of continuous improvement and will adapt our approach in response to findings.

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Ongoing Actions and Priorities (2026/27)

To maintain and strengthen our approach, RED Industries will:

- Continue to monitor supplier arrangements, with a focus on maintaining engagement with established and reputable organisations within the UK and EU
- Ensure purchasing procedures reflect relevant policies, including Modern Slavery and Anti-Bribery and Corruption requirements
- Apply appropriate due diligence when onboarding new suppliers, proportionate to the level of risk
- Continue delivery of modern slavery awareness training for managers and employees
- Maintain and review internal reporting and escalation processes to ensure concerns are effectively managed

Responsibility and Accountability

The Board of Directors has overall responsibility for ensuring compliance with legal and ethical obligations.

Day-to-day responsibility sits with the Group Projects Director, supported by HR and operational management.

Management at all levels are responsible for ensuring:

- This statement is understood within their teams
- Policies are applied consistently
- Concerns are escalated appropriately

Approval

This statement has been approved by the Board of Directors and will be reviewed annually.

Signed:

Jon Clewes

Managing Director

Date: 31/03/2026

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