

# MODERN SLAVERY STATEMENT

## 2025-2026

### Introduction

This statement sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps to ensure that there is no slavery or human trafficking in our own business and its supply chains. This statement relates to actions and activities during 2025 and 2026 and is published within six months of our financial year end, which is the last week of March each year.

As part of the recycling sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are committed to preventing slavery and human trafficking in all our activities and ensuring that our supply chains are, and remain, free from slavery and human trafficking.

### ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

This statement covers the activities of Sortera Ltd., a recycling collection and management company. Our supply chains are generally short and limited to large companies supplying large equipment and heavy goods vehicles. We have a supply chain for casual/temporary staff at some sites.

### COUNTRIES OF OPERATION AND SUPPLY

We only operate in England within the UK.

### HIGH-RISK ACTIVITIES

We have no activities considered to be at high risk of slavery or human trafficking.

## RESPONSIBILITIES

Responsibilities for the Sortera's anti-slavery initiatives is as follows:

### POLICY

All company directors are responsible for developing this policy, publishing it, reviewing it annually and ensuring all relevant staff comply.

### RISK ASSESSMENTS

Operational managers are expected to consider the implications for human rights and modern slavery whenever they assign work. If they perceive the risk to be high, then a formal written assessment of the risk is produced, and this must include actions to reduce the risk to the lowest level reasonably practicable.

### INVESTIGATIONS/DUE DILIGENCE

At any time it is known or discovered that slavery or human trafficking has occurred, a senior manager will be appointed to investigate the circumstances thoroughly. The senior manager will identify immediate causes, underlying causes and root causes for the occurrence and identify what can reasonably be done by Sortera Ltd

### TRAINING

All managers and all staff will be briefed annually concerning slavery and human trafficking and their role in reporting and preventing it. For staff awareness, we are mandating posters to be placed around worksites to raise awareness, or where a document management system (DMS) can provide the posters/documents to staff individually; this may be used in place of workplace posters.

## RELEVANT POLICIES

Sortera operates the following policy that describes its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

### WHISTLEBLOWING

Sortera encourages all its workers to report any concerns related to the direct activities or the organisation's supply chains. This includes any circumstances that may increase the risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to disclose without fear of retaliation. Employees who have concerns should follow the process described in their Employee Handbook.

### DUE DILIGENCE

Sortera undertakes due diligence when considering new suppliers and regularly reviews existing ones. We will take steps to improve substandard suppliers' practices, including advising suppliers and requiring them to implement action plans.

We will invoke sanctions against any supplier that fails to improve their performance in line with an action plan, up to and including the termination of the business relationship.

### PERFORMANCE INDICATORS

Sortera requires:

- This policy must be read by all managers by the end of 2025 and by all new managers within one year of appointment.
- All managers with staff (including agency and temporary staff) are to display the appended posters on notice boards, messrooms, and other areas frequented by staff or issue them to staff via the document management system (DMS).
- All Site Managers, at no less than 3-yearly intervals, are to obtain from their suppliers the supplier's statement on their position on modern slavery and human trafficking, this is an essential element for suppliers to be included on our Approved Supplier List.

## TRAINING AND AWARENESS-RAISING

Sortera requires all managers to ensure that at least two different appended posters are to be placed in areas frequented by staff or issued to staff via the document management system (DMS) .

## BOARD APPROVAL

The board of directors has approved this policy.

The financial year end is at the end of March each year. An updated statement will be published by the end of September 2026.

Signed by Ian Wilkinson 08/09/2025

*Ian Wilkinson*

Operations Director

### APPENDED

- Poster – Modern Slavery & Exploitation Helpline
- Poster – The GLAA Business Briefing

## Modern Slavery & Exploitation Helpline



If you need help or think someone could be a victim  
of modern slavery, call the free and confidential  
**Modern Slavery & Exploitation Helpline**  
24 hours a day, 365 days a year

**08000 121 700**

Dacă ai nevoie de ajutor sau  
crezi că cineva poate fi  
victima sclaviei sau a  
exploatării, apelează linia de  
asistență confidențială  
„sclavie modernă” din  
regatul unit. 24 de ore pe zi,  
365 de zile pe an.

如果您需要帮助，  
或者您发现奴役或  
剥削的受害者，请  
致电英国现代奴役  
匿名热线，我们提  
供全天候服务，年  
中无休。

Nếu bạn cần giúp đỡ, hoặc  
nghĩ rằng ai đó có thể là nạn  
nhân của cảnh nô lệ hoặc  
bóc lột, hãy gọi đến đường  
dây trợ giúp nô lệ thời hiện  
đại bí mật của vương quốc  
anh 24 giờ/ngày, 365  
ngày/năm.

Nëse të duhet ndihmë, ose  
mendon se dikush mund të  
jetë viktimë e skllavërisë ose  
shfrytëzimit, telefono linjën  
konfidenciale të ndihmës në  
mb kundër skllavërisë  
moderne që funksionon 24  
orë në ditë, 365 ditë në vit.

## The GLAA Business Briefing (2 pages)



As a business leader, you're in a unique position to do something about the slavery and exploitation of workers happening within your industry right now.

But, unless you know the full scale of the problem – who is being exploited, how, and by whom - you won't be armed with the information you need to make a difference.

That's why the **Gangmasters and Labour Abuse Authority (GLAA)** has created a single [report](#) outlining the reality of labour exploitation in the UK today, drawing on many months of research, victim statements, operational activity and daily workplace inspections.

We've broken down some key points here to ensure you're as informed as possible.

### KEY FINDINGS



There's a higher risk of modern slavery and worker exploitation in sectors where there's a **high turnover of staff** and where jobs are **low skill** and **low wage**, giving exploiters ample opportunity to thrive unnoticed, including the following industries:

Food/hotels	Food packaging	Warehouse and distribution	Transport
Manufacturing	Nail bars	Fishing	Agriculture
Domestic work	Care homes	Recycling/waste disposal	Social care
Car washes	Food processing	Shellfish gathering	Construction
Retail	Cleaning		



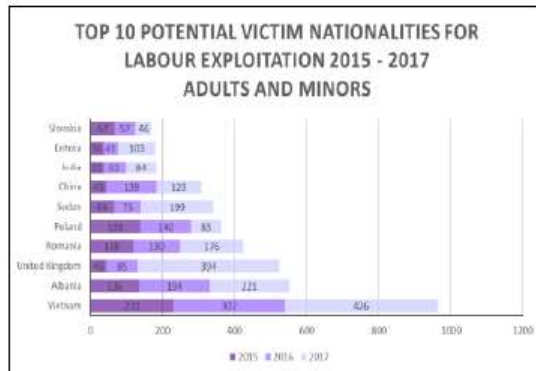
The UK is one of the main destinations of trafficked workers in Europe, with labour exploitation being the most common form of exploitation for both adults and children.

It's estimated there are **40 million** people living in slavery globally, with tens of thousands of those in the UK. **Forced labour** accounts for around 30% of all exploitation. The majority of victims are male EU nationals from **Bulgaria, Czech Republic, Estonia, Poland, Romania and Slovakia**.





Exploiters and their victims usually have the same nationality - sharing the same language and culture can help with **recruitment and control**. Sometimes foreign workers can't speak English, so they're particularly susceptible to exploitation. We've seen cases where victims' movements are controlled and medical treatment has been refused, while other victims have been prevented from using the telephone or the internet, leaving them isolated and unable to seek help.



Victims of labour exploitation are most commonly **Vietnamese, Albanian and British**.

We've seen **debt bondage** used as a tactic by exploiters, where a victim is forced to work to pay off debts they have no control over. Their wages and bank accounts are controlled and cash is withdrawn without their permission. Globally, over **70% of adults** forced to work in agriculture, domestic

work or manufacturing are involved in debt bondage. Victims are often kept in the dark about how much they owe and other deductions, like travel, rent and food, may be taken. This gains interest and may be impossible to repay, **increasing the power and control over victims**.

Some criminals get workers to register themselves as **self-employed**, which sees them give up their rights, including holiday and sick pay.



Social media, particularly Facebook, is being used to recruit workers who go on to be exploited. There's often no screening process or face-to-face meeting and some workers arrive in the UK to find the employment they have been promised doesn't exist.



Some workers are charged a daily rate for transport to and from work, with costs sometimes taken directly from workers' wages. Victims of exploitation generally tend to **live in poor, overcrowded conditions lacking basic facilities** like electricity, heating and water. And they have little choice; they may be threatened with losing their job if they find somewhere else to live.

Exploiters often control their victims by taking their identity documents or by taking control of their wages and bank accounts. They take cash to cover any 'debts' accrued. These 'debts' build interest and may never feasibly be repaid.

You have an important role to play in putting an end to slavery for good. **Be informed. Be alert. Be proactive.** Report your concerns to us by calling our helpline on **0800 432 0804** or email our intelligence team at **intelligence@glaa.gsi.gov.uk**.

Thank you, **GLAA**

## ABOUT SORTERA GROUP

Sortera is an environmental company that collects and manages waste to make sure it is transformed into resources, through reuse, recycling or energy recovery, and that toxic and harmful substances and soils are taken care of in a safe manner. Company services include construction waste management, sludge and vacuum suction, industrial and soil decontamination, water purification and trade with waste for energy recovery. Sortera supports its customers with responsiveness, great service and reliable logistics. The company was founded in 2006 and today it provides services that improve the environment for thousands of companies and individuals in northern Europe. <http://sortera.co.uk/>