



ANTI-SLAVERY AND HUMAN TRAFFICKING

Background

The Modern Slavery Act 2015 (MSA) requires large businesses, with sales of over £36 million, to be transparent about their efforts to eradicate slavery and human trafficking. This statement therefore explains the steps we have taken during the financial year of 1st October 2024 to the 30th September 2025 to ensure that slavery and human trafficking is not taking place in any of our supply chains, or any part of our business.

This statement applies which consists of URM UK Ltd (the “Group”).

The Group is fully committed to preventing acts of modern slavery and human trafficking from occurring, whether in our business or our supply chains, and we require the same standards of our suppliers.

This statement will be made available on our website to all who engage with us, whether in employment or in business, so that those parties may familiarise themselves with the contents.

The Organisation & Our Colleagues

The Group’s principal activities are Glass Recycling and associated activities. All of the Group’s operations are based in the United Kingdom and the Group employs circa 220 colleagues across its businesses.

The Group’s recruitment and onboarding processes are continually reviewed and ensure that all employees’ status to live and work in the UK are checked prior to them commencing employment within the Group. Furthermore, the Group enlists the support of an Employment Law and HR Consultancy firm to ensure that we comply with all legislation relating to the initial and ongoing employment of our colleagues.

As part of the organisation’s induction process and throughout workers’ employment with us, we train all staff to treat others with respect and courtesy as well as ensuring they adhere to all relevant laws, regulations, and standards. This is an ongoing due diligence process. We focus on ensuring our management team is not only aware of the requirements to be alert to modern slavery but can also address concerns raised by their team or any suppliers. If any worker is found in breach of our policies, we ensure suitable disciplinary action is taken which can include termination.

Our Policies

We allow all individuals who work or provide services to us, the right to freely choose employment and, the right to associate freely with other individuals.

Workers are free to choose whether to join a trade union, and as a result of our training, we offer an environment which is free from harassment and unlawful discrimination. We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation. We do not engage in forced or involuntary labour and have a zero-tolerance approach to the same, meaning we do not tolerate any of our suppliers engaging in such conduct. We require suppliers to certify that they do not participate in any forced or involuntary labour with their workers, subcontractors, agents, or associates.

Our employment policies on Equal Opportunities, Dignity at Work, Grievance, Whistleblowing and Anti-Bribery and Corruption, support our endeavours to encourage a positive working environment free from harassment and unlawful discrimination.

Suppliers

The Group's principal suppliers are all UK based, predominantly local authority, who have policies in place around modern slavery, therefore, we do not view this as a significant risk.

In addition, the Group has commercial arrangements with several Engineering companies, and employment agencies, who support the business operations.

We use our reasonable endeavors to conduct risk assessments of the third parties we work with and investigate, where feasible, the working conditions of their workers. We have procedures in place to identify whether there is a possible risk of slavery and human trafficking either in the business or our supply chain, and we aim to work with our colleagues and suppliers to ensure collaboration to remedy or mitigate such risks.

Any instances of non-compliance with the MSA, or allegations of potential modern slavery in either our Group, or in relation to a Supplier would be thoroughly investigated and dealt with appropriately on a case-by-case basis. Any allegations of non-compliance would always be reported to the Group's Leadership Team.

Areas of Potential Risk

In a recent risk assessment, we concluded that the most significant risks remain within our supply chain. Due to the complexity of the supply chain, we are unable to complete a full audit of all suppliers, especially where subcontracting work is commonplace. The Company will continue to explore options to reduce this risk as much as possible, and will not engage with any third party who does not meet the MSA 2015 requirements.

Over the course of the following year the Group will continue in its efforts to upskill managers and employees on the signs of modern slavery, and what to do should they suspect that modern slavery is present within our business, or that of our suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ended 30th September 2025.