



Modern Slavery Policy

Cox Management Services Ltd is the holding company for Cox Skips Ltd and The Recycling Partnership Ltd generally referred to within this policy as The Cox Group. The Cox Group's core business is primarily within the environmental waste and recycling industry or its subsidiary trades.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Cox Group has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

The Cox Group are committed to ensuring there is transparency in the business and in the approach to tackling modern slavery throughout the supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

The Cox Group expect the same high standard from their contractors, suppliers and other business partners. This policy applies to all persons working for the Cox Group or on their behalf in any capacity, including but not limited to; employees at all levels, directors, officers, agency workers, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and The Cox Group may amend it at any time.

Responsibility

The Cox Group has overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under the control of The Cox Group comply with it.

The Cox Group has primary and day to day responsibility for implementing this policy, monitoring its use and effectiveness through internal audits, dealing with any queries about it, and auditing internal control systems and procedures at least annually in accordance with the ISO Management systems to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.



Compliance

The Cox Group ensures that all employees read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the Cox Group or supply chains is the responsibility of all those working for the Cox Group or under their control.

Any employees, business partner, contractor or supplier must avoid any activity that might lead to, or suggest a breach of this policy. They must notify a Line Manager or Company Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

All associated persons are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Cox Group business or supply chains of any supplier tier at the earliest possible stage. A suspected breach of this policy must be notified to the Line Manager or Company Director and reported in accordance with our Whistleblowing Policy (QSOP 119) as soon as possible.

The Cox Group aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Cox Group are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the business or in any of their supply chains.

Detrimental treatment includes dismissal, disciplinary actions, threats or other unfavourable treatment connected with raising a concern.

Any employee who believes that they may have suffered such treatment should inform their Line Manager immediately or alternatively follow the Grievance Procedure in accordance with Employee Handbook (QSS 501).

Communication

Training on this policy and on the risk the business faces from modern slavery in its supply chain, forms part of the annual training for all individuals who work for The Cox Group and updates are provided using established methods of communication, including but not limited to, HR Toolkit, staff noticeboard and E Learning.

Breaches

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The disciplinary procedure will be carried out as per The Employee



Handbook (QSS 501). The Cox Group has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

The Cox Group hold the right to terminate a business relationship with other individuals and organisations that work on their behalf this policy is breached.

A handwritten signature in black ink that reads 'Allan Key'.

Allan Key
Director