

INTRODUCTION

RiverRidge operates Northern Ireland's most integrated waste management company. Initially acquired in 2011, the company has undergone substantial investment over the past number of years which has transformed it from a small skip hire and landfill business to the fully integrated waste recovery operation it is today.

Currently RiverRidge operates over 5 sites across Northern Ireland, (Garvagh, Maydown, Portadown, Mallusk and Belfast) and directly employs approximately **300** people across the group. The Company's philosophy of Rethinking Resources is deeply rooted in the concept of circular economies and is focused on the efficient use of materials through multi layered life cycles.

Within our business, RiverRidge recognises that modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. RiverRidge are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015.

As part of this process, we are committed to undertaking a review of our supply chain to identify and assess potential risk areas and maintain a record detailing the same within our business risk register.

Our commitment to ensuring our business and its operations are free from modern slavery and human trafficking is also embedded within our ESG strategy, **launched in 2022**, where this is reflective in 2 of our 3 core principles. As such, the Company is committed to leading the way as a responsible and sustainable business and ensuring we all look after our people, our customers and the community we work in.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives, and business partners. The policy underpins our approach and will be used to inform our Statement on Slavery and Human Trafficking.

POLICIES

RiverRidge has in place the following policies and procedures to ensure that we are conducting business in an ethical, legal and transparent manner to ensure we prevent slavery and human trafficking in its operations. These include:

- Equal Opportunities Policy
- Recruitment & Selection Procedure
- Bullying & Harassment (Dignity at work) Policy
- Whistle Blowing (Protected Disclosure) Policy
- Anti Bribery & Corruption Policy
- Integrated Management System Policy
- Equality Inclusion and Diversity Policy

All our policies are available on request from the HR department.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

RiverRidge operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that the particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviours.
- We have in place procedures to encourage the reporting of concerns and the protection of whistleblowers.

Due to the nature of our business and where we operate, we assess ourselves to have low risk of modern slavery in our business and our suppliers.

RESPONSIBILITY FOR THE POLICY

The CEO of RiverRidge has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all of our people comply with it.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand, and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Although you should report any concerns regarding modern slavery and/or human trafficking in any parts of our business or supply chains in accordance with our Whistle Blowing policy, you are also encouraged to discuss a specific matter (or our policy or relevant legislation) with the Human Resource Manager or Director.

If you are in any doubt about whether a particular act or working conditions in any of our business relationships may contravene any aspect of this policy, then err on the side of caution and report it in accordance with the Whistle Blowing policy or speak to the Human Resources Manager or Director.

We encourage openness and will support anyone who raises genuine concerns in good faith in accordance with the Company's Whistle Blowing policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our business or in any of our supply chains.

COMMUNICATION, AWARENESS AND TRAINING OF THIS POLICY

We will continue to embed our zero-tolerance approach to modern slavery & human trafficking and this will be communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We will provide annual awareness training to our employees on this policy/statement, informing them of the appropriate action to take if they suspect a case of slavery or human trafficking and to ensure there is a high level of understanding of the risks of modern slavery and human trafficking in our business.

This statement and policy will be made available online and all new employees will be made aware of this at their induction.

BREACHES OF THIS POLICY

Any employee who breaches this policy could face disciplinary action, which could result in their dismissal.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

RIVERRIDGE VALUE STATEMENT

“As part of our culture of good governance for business, RiverRidge operates to a set of core values, which reflect relationships with our supply chain and employees. Our business values oppose the exploitation of individuals in any form and more particularly the offenses under the Modern Slavery Act 2015.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same commitment of all who work for us and expect it from all we have business dealings with.

“The RiverRidge attitude to Modern Slavery is: Zero Tolerance.”



Brett Ross CEO