

## **Recorra Ltd – MODERN SLAVERY STATEMENT**

Under the terms of the Modern Slavery Act 2015, Recorra does not meet the requirements for publishing a statement however we have a zero-tolerance policy towards slavery and human trafficking and are committed to complying with the provisions in the Act. As such, we have taken the decision to publish this statement in order to make our position clear.

This statement applies to Recorra Ltd and its subsidiaries. Recorra was formerly known as BPR Group which included Paper Round, Secure Paper, Brighton Paper Round Ltd and Reef Environmental Solutions Ltd. Recorra is controlled by a Board of Directors. The information included in the statement refers to the financial year ending 31<sup>st</sup> March 2024.

### **A) ORGANISATION**

Recorra was founded by Friends of the Earth in 1988 (as Paper Round), specifically to provide high quality environmental services to offices in London. We have kept this focus on meeting the highest environmental standards as we have grown to offer a complete spectrum of waste management services to businesses in London and the South East. This includes the collection, transportation, processing and recycling of waste materials and equipment and, additionally, the secure collection and destruction of confidential waste products. Recorra also supplies office stationery products, including a wide range of recycled products.

Recorra operates from the following locations:

- Recorra Head Office – London
- Materials Recycling Facility - Essex
- South Coast Recycling Services – Brighton and Hastings, East Sussex

The labour supplied to Recorra in pursuance of its operation is wholly carried out in the United Kingdom. Demand for Recorra's services is consistently high throughout the year and is therefore not seasonal.

### **B) DEFINITIONS**

Recorra considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

## **C) COMMITMENT**

Recorra acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both our internal practices in relation to our labour force and, additionally, our supply chains.

Recorra does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Recorra in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Recorra strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases, we exceed those minimums in relation to our employees.

## **D) SUPPLY CHAINS**

We have a zero tolerance policy to slavery and human trafficking and expect all those in our supply chain and contractors to comply with our values.

In order to fulfil our activities, Recorra's main supply chains include those related to the supply of equipment, goods and services from various suppliers in both the United Kingdom and Europe. We understand that for some goods and equipment, Recorra's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

## **E) POTENTIAL EXPOSURE**

In general, Recorra considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, we have taken steps to ensure that such practices do not take place within our business, nor within the business of any organisation that supplies goods and/or services to us. Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour.

## **F) STEPS**

Recorra carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in our organisation or supply chains, including conducting a review of the controls of our suppliers.

Recorra has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Recorra has taken the following steps to ensure that modern slavery is not taking place:

- We have transparent recruitment processes which are reviewed regularly, as well as robust procedures in place for the vetting of new employees. We ensure we are able to confirm their identity and that they are paid directly into an appropriate personal bank account.

- To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

#### **G) KEY PERFORMANCE INDICATORS**

Recorra has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place within Recorra itself, or in its supply chains:

- Use of labour monitoring and payroll systems
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations

In the future we intend to:

- Put further measures in place to identify and assess the potential risks in our supply chains
- Review supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery

#### **H) POLICIES**

Recorra has the following policies which further define its stance on modern slavery:

- Corporate Social Responsibility Policy
- Ethical Policy
- Sustainable Procurement Policy
- Equal Opportunities Policy
- Quality Policy

#### **I) SLAVERY COMPLIANCE OFFICER**

Recorra has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regards to Recorra's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed: 

Date: 01/04/24

MANAGING DIRECTOR