



## **Modern anti-slavery policy/statement**

WEEE Ireland has worked for the past 15 years providing compliance services to our Producer Members in relation to their Extended Producer Responsibility obligation to finance the environmentally sound management of waste electrical and electronic equipment (EEE) and batteries under the Irish WEEE and Batteries Regulations. With Extended Producer Responsibility Legislation requiring the producers or importers of electrical and electronic equipment, batteries, and accumulators to finance the end of life of their products through collection and recycling. We endeavour work to the highest of standards in all areas and comply with all regulations applicable to our scheme on behalf of our Members.

Our staff are employed through ethical practices overseen by a Human Resource Expert, to ensure the highest of standards set down by regulations are respected and implemented.

Within the Republic of Ireland, the legislation overseeing any acts of Modern Slavery and Human trafficking is the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013 and also the EU Charter of fundamental rights, where Article 5, states that no one will be held in slavery or servitude, Article 5.2 asserts that no one will be required to perform forced or compulsory labour and Article 5.3 states that trafficking in human beings is prohibited.

We, at WEEE Ireland recognise that slavery, servitude, forced labour and human trafficking (modern slavery) are world-wide and growing issues in today's global economy. Our sector has been specifically targeted by perpetrators of this crime in other countries. As the leading waste EEE and battery compliance scheme operating in Ireland, we recognise the global reach of our industry and the need for a robust approach to slavery and human trafficking. We commit to identifying areas of risk within our business and developing strategies to prevent and to manage those risks proactively. We seek to put in place the policies and process that will mitigate any future risk both within WEEE Ireland and in our downstream contractors.

While our own Company has organised the collection and treatment of thousands of tons of waste, we have no recycling facility or transport vehicles of our own and thus partner with downstream treatment facilities and logistic companies in Ireland and in other countries in order to best serve our customers. We need to ensure that these companies work to the highest of Irish and International standards and that we monitor their downstream activities closely. We also work to ensure transparency within our own organisation and with our suppliers of goods and services, both in Ireland and Internationally. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business or suppliers. We commit to acting ethically and with integrity in all of our corporate business relationships and to implementing and enforcing effective controls to ensure that slavery and human trafficking is not taking place anywhere in our supply chains or with our contractors.

### **At WEEE Ireland we commit to:**

- ✓ Measure, manage and mitigate the risk through our Risk Register
- ✓ Perform due diligence
- ✓ Put in place anti-modern slavery and anti-human trafficking agreements with all of our downstream contractors
- ✓ Require all contractors and suppliers to fill in a modern slavery and human trafficking questionnaire

- ✓ Not work with any suppliers who have demonstrably and repeatedly failed to comply with basic International Labour Organisation (ILO) standards
- ✓ Work to the highest of ethical standards to ensure that there is no modern slavery or human trafficking in our supply chains
- ✓ Consider the social, environmental and sustainability factors and to also alongside this consider the risks of modern slavery and human trafficking when seeking tenders from contractors and suppliers and to write these requirements into any future green procurement protocols

This commitment is shared by the CEO and Board of Directors who will support the and oversee the activity described in this policy by ongoing review at each meeting held by the Procurement Committee.

Dated 22<sup>nd</sup> October 2021

Signed



CEO Leo Donovan

Review Date: 01/12/2022