

## Modern Slavery Policy

### Policy Statement

At the S. Norton Group, we are committed to improving our practices to combat slavery and human trafficking in our business and supply chain.

#### Organisation

**S. Norton Group** is at the forefront of British metal recycling offering metals and plastics recycling services and products that deliver on quality and price for its customers.

S. Norton Group comprises two complementary recycling brands: S. Norton, and Axion Polymers which work together as an integrated operation. The Group purchases and processes around 1.5 million tonnes of metal based scrap material each year. Through the two brands, we recycle up to 95% of all materials we process, via shredding, and our commitment to the environment is embodied with our target of sending zero waste to landfill, an objective we constantly strive towards.

We pride ourselves on our reputation and deal with all different types of trade. Our core business is the recycling of both ferrous and non-ferrous scrap metal from sources such as

- End of life vehicles
- Car manufacturers
- Demolition companies
- Metal merchants
- Civic amenity sites
- Trade and general public

We have over 400 employees and operate across the United Kingdom.

#### Our supply chains

Our supply chains include: Shipping, Logistics, Scrap metal companies, machinery suppliers, plastics additive manufacturers, plastics moulders, food suppliers and office goods.

#### Our policies on slavery and human trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We review and update our policies as required.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

#### Due diligence processes for slavery and human trafficking

We understand that the following areas give rise to the highest modern slavery risks:

- Ships entering the UK on our behalf for collection of our metals.
- Vehicle movements across the country, collecting our metals and plastics (& other) recyclable waste.

- Recruitment of Staff
- Agencies which are utilised for various types of workers.
- Third party scrap metal companies
- Food suppliers

As part of our initiative to identify and mitigate risk we ensure all agencies we use undertake the necessary checks to minimise the risk of S. Norton Group employing anyone who is at risk of modern slavery.

Furthermore, the company also carries out rigorous checks when employing a permanent member of staff which includes reference checks and right to work checks, confirming right to work in the UK and date of birth.

Due to our transport routes within the UK road network and our shipping of materials, we train our policy out to create awareness within these areas to educate the potential risks and how our employees can escalate any concerns.

We also have in place systems to:

- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a system which ensures that all the following departments are aware of the legislation and what steps to take if anyone is suspicious of any acts which fall under the Modern Slavery Act 2015.

- Legal
- Health and Safety, which covers Audit and Compliance.
- Human resources
- Transport
- Procurement
- Sales

### **Training**

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 our staff.

### **Further steps**

Following a review of the effectiveness of the steps we have taken last year to ensure that there is no slavery or human trafficking in our supply chains we have reviewed our policies and intend to take the following further steps to combat slavery and human trafficking:

- Continue to follow our robust recruitment and procurement processes; and
- Raise awareness of and seek assurances from suppliers that there is no slavery or human trafficking within the supply chain.



**S. Norton  
Group**

Responsible Recycling

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 ending 31<sup>st</sup> December 2025.

It was approved by the Managing Director on the 1<sup>st</sup> March 2025.

Tony Hayer  
Managing Director  
S. Norton & Co Ltd





1. Modern slavery is a crime and a gross 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 to exploit them for personal or commercial gain. S. Norton & Company Limited have 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 own business or in any of our supply chains.
2. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
  - 2.1 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, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
  - 2.2 This policy does not form part of any employee's contract of employment, and we may amend it at any time.
3. **Responsibility for the Policy**
  - 3.1 At parent Company level the Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
  - 3.2 The management of the policy is delegated to the operating Company Board for S. Norton & Company Limited.
  - 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training and awareness.
  - 3.4 Employees at all levels are responsible for reporting any incidents they know or reasonably believe may breach this policy.
4. **Compliance with the Policy**
  - 4.1 The Group HR Manager is nominated as the Company Compliance Manager.
  - 4.2 You must ensure that you read, understand and comply with this policy.
  - 4.3 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.



- 4.4 You must notify your manager or the compliance manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 4.5 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.6 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or the Compliance Manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 4.7 As defined earlier modern slavery takes many forms, all of which are sensitive and some, such as trafficking, could be dangerous. You are not therefore expected to confront issues directly. Once reported to the Company, based on the circumstances, a decision will be taken as to whether to inform the police or other such relevant authorities.
- 4.8 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Compliance Manager.
- 4.9 We 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. We are committed to ensuring 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the company handbook and in your contract of employment.

## 5. Communication and Awareness of this Policy

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us.
- 5.2 Communication thereafter will be via notice boards, 'flyers' and other means as deemed appropriate.
- 5.3 Our zero-tolerance approach to modern slavery is articulated in a statement which is accessible from the HR Department of S. Norton & Company Limited and also documented on the S. Norton Company Limited website.
- 5.4 Our zero-tolerance approach to modern slavery must also be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. See letters in appendices 1&2.

## 6. Breaches of this Policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.