

Anti-Slavery and Human Trafficking Statement

This statement, which is made on behalf of the Reconomy Board, for the financial year ending 31st December 2019, describes our efforts to mitigate the risk of slavery and human trafficking pursuant to section 54(1) of the Modern Slavery Act 2015.

About our Business:

Reconomy is the UK's leading provider of outsourced waste management and recycling services. The company provides a tech enabled, comprehensive waste and environmental management service through a nationwide network of approved service providers.

The Reconomy Group co-ordinates an average of 100,000 waste movements per month from our National Head Office in Telford and our numerous regional office locations across the UK. We consistently divert 94% of all waste managed away from landfill, helping to meet government objectives, preserve the environment and make significant cost savings for our clients.

Reconomy UK Ltd and its subsidiaries are solely based and operational within the UK. We employ in excess of 350 people and reported an annual turnover of over £146m in 2019.

Our Policy on Anti-Slavery and Human Trafficking:

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and require our suppliers to do the same.

Reconomy is Committed to:

- Complying with all legislation and regulatory requirements relating to the Modern Slavery Act
- Making suppliers and service providers aware of our commitment, and their responsibilities, in complying with this legislation.
- Ensuring that modern slavery is considered throughout our accreditation and supplier selection process by including conditions or criteria in our terms and conditions and supplier code of conduct.
- Developing wider awareness of modern slavery and encouraging our suppliers and service providers to take their own action and understand their obligations to eradicating modern slavery.

The Reconomy Supply Chain:

All Reconomy employees must work with our supply chain and compliance departments when seeking to recruit new suppliers to ensure that appropriate compliance checks are carried out.

Progress

- Reconomy continues to engage with Hope for Justice and the Anti-Slavery Alliance
- We have extended our Modern Slavery training to include all staff
- We continue to review and monitor our recruitment process to ensure risks are minimised
- Developed and implemented a Supplier Sustainability Charter to include Anti-Slavery, Human Trafficking and Human Rights requirements
- Included modern slavery in the Reconomy induction programme and made e-learning available to all staff
- Undertaken a preferred supplier 'hot spot' risk assessment
- Reviewed our assessment and audit process to ensure effectiveness
- Developed a longer-term plan to mitigate the risks of modern slavery within our business and supply chain
- Held a Hope for Justice training awareness session with all our preferred suppliers invited

We will:

- As a partner in the Supply Chain Sustainability School, along with our supply chain, access extensive free practical support on Modern Slavery
- Take action with suppliers identified as high risk through our 'hot spot' assessment
- Survey all suppliers
- Continue to engage with Hope for Justice
- Keep our people and suppliers up to date with industry intelligence
- Have an effective assessment and audit process in place
- Monitor the implementation of our supplier charter
- Put in place a remediation policy to help victims find bone fide jobs in the industry
- Explore the potential effectiveness of putting a Modern Slavery Steering Group in place
- Work with the wider waste management industry on an agreed approach and shared resources to eradicate modern slavery

Reconomy's Procurement and Supply Chain Staff will:

- Ensure they are aware of our policy on slavery and human trafficking.
- Through our accreditation and assessment processes, check that suppliers are committed to supporting the requirements of the Modern Slavery Act.
- Not award contracts where suppliers do not demonstrate a commitment to ensuring that slavery and human trafficking are not taking place in their own business or supply chains.

Signature:

A handwritten signature in black ink, appearing to be "Paul Cox", written over a light grey rectangular background.

Name of Signatory: Paul Cox
Position: Chief Executive Officer
Date: January 2020