

# Anti-Slavery and Human Trafficking Statement

This statement, which is made on behalf of the Reconomy Board, for the financial year ending 31st December 2020, 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 95% 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 operational in the UK and Germany. We employ in excess of 370 people and reported an annual turnover of over £150m in 2020.

## 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
- Our Modern Slavery e learning training is mandatory for all staff with annual refresher training
- We continue to review and monitor our recruitment process to ensure risks are minimised
- Our Supplier Sustainability Charter to include Anti-Slavery, Human Trafficking and Human Rights requirements has been communicated and fully implemented with all suppliers
- Modern slavery is now core to the Reconomy induction programme
- 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.

### In addition

In 2020 we were invited to join the **Waste & Recycling Modern Slavery Working Group** chaired by the Slave Free Alliance. The purpose of this group is to:

- Raise awareness and share best practice in relation to mitigating risks relating to modern slavery for the industry
- Reduce supplier audit fatigue
- Save costs by working collaboratively on shared projects.

In 2019, through our work with the Indirect Human Rights Forum (IPHR), we launched the **IPHR Waste & Recycling Working Group**. In 2020, we have established this group as a truly cross-sector network, with over twenty different organisations represented, each with interests and expertise in different elements of human rights and the waste and recycling sector and supply chain. Our membership includes waste service providers, customers, NGOs and Governmental organisations.

Much of our activity this year has been focussed on raising awareness of the modern slavery and human rights risks in the sector and extending our network. This has included coverage in specialist press for the sector and speaking on a webinar panel alongside thought leaders on this topic. As a group we have reviewed our strategic direction and agreed the objectives for the year ahead:

- Identify and assess labour rights issues in the waste & recycling sector;
- Develop shared resources to address human rights issues in the waste & recycling sector;
- Raise awareness and engagement on human rights issues in the waste & recycling sector.

In 2021 we expect to increase our collaboration with other partners and develop resources which will be made available to all.

## 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
- Explore the potential for helping 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 read "Paul Cox".

**Name of Signatory:** Paul Cox  
**Position:** Chief Executive Officer  
**Date:** 11<sup>th</sup> January 2021

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