

Modern Slavery Statement

This statement, which is made on behalf of the Reconomy Board, for the financial year ending 31st December 2022, 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 in the UK 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 98% of all waste managed away from landfill, helping to meet government objectives, preserve the environment and make significant cost savings for our customers.

Reconomy UK Ltd and its waste and resources brands are operational in the UK. We employ more than 250 people and reported an annual turnover of over £118m in 2022.

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.

Document Reference:
hssa stat 003 anti slavery - 2023v2.docx

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No: 6

Revision Date:
08/02/2023

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Continued collaboration

Reconomy take an active role in the following groups dedicated to eradicating modern slavery:

- **Indirect Procurement Human Rights Waste and Recycling Working Group (IPHR)** is a cross-sector network of over twenty organisations. Our membership includes waste service providers, customers, NGOs and Governmental organisations. In 2022, our objectives were to:
 - identify and assess labour rights issues,
 - develop shared resources to address human rights issues in the sector,
 - to raise awareness and engagement
- **Waste & Recycling Modern Slavery Working Group** Chaired by the Slave Free Alliance, much of our activity is focussed on raising awareness of the modern slavery and human rights risks in the sector and extending our network. 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
- **Supply Chain Sustainability School's Modern Day Slavery Labour Group** Develops training and awareness resources for the Supply Chain Sustainability School
- **Indirect Spend Alliance - Waste & Recycling Group** Working with supply chains, including wider supplier network groups, around issues of modern slavery. Reconomy supported a Modern Slavery webinar to raise awareness of the risks in this sector

Reconomy contributed to the development of the IPHR's Tackling Modern Slavery in Waste and Recycling Toolkit in 2021 which we continue to promote. In 2022 we supported the launch of an industry Modern Slavery protocol with a webinar to mark Anti-Slavery Day. Reconomy was part of the webinar panel and we promoted the webinar and toolkit extensively with our supply chain. It is made available via the CIWM website as a free resource.

In 2022 we continued to collaborate with partners, use, and further develop, resources that are available to all.

Actions in 2022

- Reconomy engaged with Hope for Justice and the Anti-Slavery Alliance
- We continue to review and monitor our recruitment process to ensure risks are minimised
- We supported the IPHR and software developer, Ngaje, in development of the employee engagement tool to monitor how safe employees felt at work
- Provided input and supported launch of the [Waste & Recycling Modern Slavery Protocol](#)
- Our Group Site Facility Compliance Assessor's role now shares the protocol, and signposts to the CIWM and IPHR modern slavery tool kit with suppliers. This helps raise awareness with some of the SMEs in the industry that may not have awareness of advice and support available
- Participated in IPHR MRW on collaboration meetings throughout the year

In addition

- Our Modern Slavery e-learning training is mandatory for all staff with annual refresher training
- 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 core to the Reconomy induction programme
- Our Supply Chain Compliance Assessment has been reviewed and updated to include robust questions about their activities that protect against and eradicate Modern Slavery
- Held a Modern Slavery webinar in conjunction with MRW and IPHR

In 2023 we have committed to:

Support the Supply Chain Sustainability School's Modern Day Slavery Labour Group to set priorities for training and raising awareness in 2023/2024.

Support the Food Network for Ethical Trading to look at human rights issues in their waste management processes.

Support the IPHR with lunch and learn webinars – specifically around due diligence and monitoring within the supply chain

Meet KPIs for facility audits. Our targets are to visit 100% of all approved and preferred suppliers and 25% of compliant suppliers. We will continue to promote the use of the IPHR toolkit through the CIWM website at these visits and give all suppliers the opportunity to publicly commit to the Waste & Recycling Modern Slavery Protocol.

We will continue to:

- access extensive free practical support on Modern Slavery as a partner in the Supply Chain Sustainability School, along with our supply chain
- Take action with suppliers identified as high risk through our 'hot spot' assessment
- Survey relevant and appropriate Group suppliers
- Continue to engage with Hope for Justice and the other working groups we have committed to
- Keep our people and suppliers up to date with relevant industry intelligence
- Have an effective supplier assessment process in place
- Monitor the implementation of our supplier charter
- Explore the potential for helping victims find bone fide jobs in the industry
- 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 "Michael Benton".

Name of Signatory: Michael Benton
Position: Managing Director
Date: 08/02/2023

Document Reference:
hssa stat 003 anti slaverv - 2023v2.docx

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