

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

INTRODUCTION

This statement sets out the actions undertaken by Severn Waste Services Limited (“Severn Waste”), and Mercia Waste Management Limited (“Mercia Waste”) in understanding modern slavery risks related to their businesses and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking either in their own business or supply chains.

Severn Waste and Mercia Waste recognise that they have a responsibility to take a robust approach to slavery and human trafficking and are committed to the prevention of it in their corporate activities and to ensuring that their supply chains are free from such activities.

OUR BUSINESS

Severn Waste & Mercia Waste are mainly focussed on municipal waste management in Worcestershire and Herefordshire. With close ties to Worcestershire County Council and Herefordshire Council, we have secured improvements in the sustainability of waste management in the two counties. The companies undertake a range of waste management activities and operate a number of different facilities which enable them to recycle, produce electricity, compost or dispose of waste.

Severn Waste and Mercia Waste are jointly owned by FCC Environment Services (UK) Limited and Urbaser Limited. These organisations are in turn owned by two major conglomerates, FCC (Fomento de Construcciones y Contratas S.A.) and Firion Investment SLU respectively.

Severn Waste has over 300 employees. Mercia Waste has no employees.

As detailed in Severn Waste’s last audited accounts for the period to 31 December 2020, the company has an annual turnover of approximately £33.85M. For the same period Mercia Waste reported an annual turnover of approximately £63.6M.

Severn Waste and Mercia Waste operate in the UK only.

OUR SUPPLY CHAINS

The nature of our businesses is such that we have a supply chains which are limited in length and scope.

Severn Waste is responsible for the delivery of the services contracted by Mercia Waste with Worcestershire County Council and Herefordshire Council, in addition to certain, related, commercial activities. Mercia sells items such as recyclable material to third parties.

Severn Waste and Mercia Waste have undertaken an initial review of their supplier relationships, which indicated a relatively low risk of modern slavery and human trafficking amongst their supplier base. The companies remain conscious of the need for constant vigilance on this matter, and purchasing processes are regularly reviewed and updated where appropriate.

The Staff policies in respect of Modern Slavery which were implemented during 2019 have been reviewed. We continue to ensure all current and new employees receive training on Severn Waste’s own Modern Slavery Policy, equipping those involved in the procurement of goods and services for both Severn Waste and Mercia Waste to be aware of the risks and signs of modern slavery amongst

its supplier base, and to respond appropriately if and when concerns arise. Staff training also included the whistleblowing procedures and policy.

OUR POLICIES AND PROCEDURES

We have a number of internal policies and practices which are openly shared with all employees as we believe that education is the most important step an organisation can take to eliminate modern slavery, exploitation and human trafficking in all its forms from the supply chain.

EDUCATION

All employees responsible for recruitment and supply chain management are aware of the companies' commitment to the identification of modern slavery and human trafficking issues, of the risk factors and what to do if they suspect someone is at risk.

Employees involved in recruitment are trained to ensure that those being interviewed are seen privately and that they have freedom over their own documentation.

Managers and supervisors are trained to identify those who could be at risk in the workplace and to monitor and be aware of general employee health and circumstances.

All employees responsible for interviewing or induction clearly explain that there is no direct or indirect recruitment fee to be paid by the employee, all employment is granted freely to the candidate and conducted on fair principles. Employees will never have to pay to remain employed or to pass the probationary period nor will they have to pay for any equipment required to undertake their work. Payment for work will be made to the account of the financial institution (bank, building society etc) nominated by the employee. If the account is not in the name of the employee further verification will be required.

MONITORING AND AUDITING

All agencies and labour providers must be registered with the Gangmaster Licencing Abuse Authority (GLAA) and have an anti-slavery policy in line with our own which will be discussed at audit.

Agency and labour provider audits will be carried out regularly by our staff on agency premises or this year remotely, due to COVID-19 restrictions, to ensure they are compliant. Any serious non-compliance will result in immediate termination of the association and we will also report any such non-compliance.

All staff will have the modern slavery exploitation or human trafficking reporting process explained so they are able to report any actual or perceived non-compliance, including by anonymous means if preferred, and this information will be displayed in communal areas.

DOCUMENTATION

The Company Handbook is available to all staff of Severn Waste, this explains the procedures in place, the content and scope of which are discussed at the employee's induction. The Handbook is reviewed regularly by the Companies' lawyers to ensure legal compliance is maintained.

Polices including those relating to bribery and corruption, complaints, whistleblowing and grievances are available to all employees. Employees are instructed at induction as to the content and scope of the policies.

The process for supplier selection is documented as part of our internal Quality Management procedures.

Stronger2gether (<https://www.stronger2gether.org/>) literature including multi language leaflets, posters and helpline numbers is available in communal areas such as canteens, and on notice boards to give help, guidance and information on modern slavery and exploitation.

DUE DILIGENCE

Before a supplier is appointed, we require our suppliers to produce information in respect of their policies and procedures relating to labour and the supply chain. The information requested will be commensurate with both the entity supplying the goods or services and the nature of the supply itself.

With regard to national or international supply chains our point of contact is preferably with a UK company or branch. We would require this entity to have suitable policies and procedures in place relating to slavery and human trafficking.

We have systems in place which actively encourage the reporting of any concerns in respect of slavery and trafficking and give the assurance that any information received will be dealt with in strict confidence.

EFFECTIVENESS

We understand that the modern slavery risk is not static and we will continue to assess the risks in the years ahead. We will continue to assess the effectiveness of the measures in place via monitoring, staff training, supply chain audit and the verification of, and investigation into reports of modern slavery.

SIGN OFF

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Severn Waste and Mercia Waste's modern slavery and human trafficking statement for the financial year ending 31 December 2021. The Companies intend to publish the next statement prior to 30 June 2022.



Signature

J W Haywood

Financial Director

Date of Board Approval: **4th June 2021**