

Modern Slavery Act 2015

Slavery and Human Trafficking Statement

This statement refers to the financial year ending 31 December 2024 and sets out the steps taken by our business.

Introduction from the Chief Executive Officer

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It outlines the steps taken by FCC Environment (UK) Limited and its Group Companies; FCC PFI Holdings Limited, Green Recovery Projects Limited, FCC Waste Management Limited and FCC Environment Services (UK) Limited, together known as “The Group”, to prevent and mitigate the risk of modern slavery and human trafficking during the financial year from 1st January 2024.

For a full list of company subsidiaries please see the attached company list.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which involve the exploitation of individuals for personal or commercial gain. The Group maintains a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings. We implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or supply chains.

Since publishing our first Anti-Slavery Statement in November 2016 we have continued to increase our awareness by continuing our staff education programme and enhanced training at our operational sites. Our training department maintains a schedule to ensure that all staff, both new and existing, receive training.

Our code of conduct ensures that our ethical standards come directly from our management, and our achievements and goals are clear.

In January 2025 The Group became a member of the Slave Free Alliance (SFA), a social enterprise established by the global anti-trafficking charity Hope for Justice. As part of our membership, the SFA will conduct a full gap analysis, meet with key staff, provide consultancy services to us and support our learning initiatives.

We are also committed to transparency in our business and supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all contractors, suppliers and business partners. We work closely with our supply chain to ensure our partners share our commitment to the prevention of this crime.

Our contracting process includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. The Group understand that complex supply chains pose the greatest risks for vulnerable workers and this is where our efforts are most concentrated.

We expect our suppliers to hold their own suppliers to the same high standards.

Organisation's structure

The Group is one of the UK's leading waste and resource management companies providing a range of services from collecting business and municipal waste to recycling and processing and the generation of energy from waste.

We are committed to maintaining the highest ethical standards. While we recognise that modern slavery may exist in the waste sector, we strive to ensure that it does

not occur in any part of our business or in our supply chains. Our anti-slavery policy reflects our commitment to ethical conduct and the implementation of effective systems and controls. Through training we aim to ensure all employees understand this crime and have the knowledge and confidence to spot it and ability to report it.

Our values and behaviours

The Group has a vision for growth and development shaped by our core values. These values guide how we treat our employees, colleagues and customers. Our vision includes zero accidents, zero harassment and zero

discrimination. Our commitment to upholding our values is supported by safe reporting of incidents and irregularities through our whistleblowing channel.

Our values



Environmental Commitment

Ensuring our actions are environmentally and socially responsible. We focus on efficiency, consider our impact, engage with communities, educate others and take pride in our work.



People Focus

Valuing and supporting our teams. We recognise contributions, promote equality, listen to feedback and invest in development.



Forward Thinking

Embracing change and preparing for the future. We push boundaries, act swiftly, learn from mistakes and explore new ideas.



Doing the Right Thing

Building a secure future through customer focus and quality service. We prioritise safety, uphold standards and deliver on our commitments.

Due diligence processes

We have conducted due diligence checks on all suppliers through ethical and compliance questionnaires and audits. We are committed to continuous improvement and have implemented systems to:

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

Recognising that temporary labour presents the highest risk, we have prioritised our efforts on this area. The Group only engage labour from recruitment agencies who are members of the Slave Free Alliance, Stronger Together and hold a current Gangmasters and Labour Abuse Authority (GLAA) licence. The agencies conduct site visits and interact with workers, providing opportunities for concerns to be raised. They also conduct regular surveys to ensure workers are not being charged for personal protective equipment, work finding fees and other indicators of modern slavery.

Risk assessment and management

To ensure compliance with our values, ethics, and policies, and we have implemented a supply chain compliance programme.

All suppliers, both new and existing, must confirm adherence to our Code of Conduct and policies or demonstrate that they have equivalent policies in place.

Training

To promote a strong understanding of modern slavery and human trafficking risks, we provide awareness training to all staff. Supervisors and managers receive regular training to help them identify signs of slavery and understand the appropriate actions to take.

Annual Toolbox Talks (TBT) are conducted at all sites by site managers to reinforce previous training and ensure staff remain vigilant.

Our training programme has been enhanced to ensure all staff receive a full refresher every 3 years. Reminders are issued at least three months before training certification expires to allow sufficient time for renewal.

A refreshed training programme is scheduled for rollout in mid 2025. As part of our membership with the SFA we will receive guidance on our training content and have access to their SFA e-learning module. Following the completion of the gap analysis and training review, we aim to launch the updated programme via our learning portal.

Training compliance is monitored by the training department, and reported monthly to the Senior Leadership Team.

We also highlight the risks relating to slavery and human trafficking during Anti-Slavery Week, and have a week long information driven programme emphasising the risks and the resultant human suffering. We encourage staff participation in anti-slavery initiatives and promote Anti-Slavery Day to raise awareness and support related charities.

Our effectiveness in combating slavery and human trafficking

In 2025 we will appoint a Business Compliance Officer reporting to the Head of Business Compliance. This role will focus on reviewing our risk management approach and ensuring all our Policies and Procedures including those relevant to the Modern Slavery Act remain current and effective.

The Board adopted a new Code of Ethics (CoE) in 2020 which includes a Human Rights Policy. This was refreshed in 2024 and will be formally adopted by the Group in 2025.

The Procurement Policy was also reviewed in 2024 and supplier questionnaires addressing modern slavery are part of our control framework.

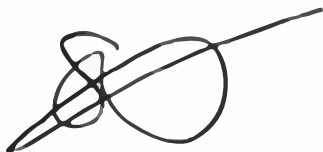
Compliance responsibilities are assigned to senior managers and audited by our Safety, Health, Environment and Quality team. Findings are reported to the Board and included in the Compliance Committee's reports. A half yearly certification process ensures that controls are regularly reviewed, risk based and proportionate.

We use the following key performance indicators (KPIs) to evaluate our effectiveness;

- Recognition that modern slavery risks evolve, requiring ongoing mitigation efforts.
- Monitoring of staff training, supply chain audits, and investigations into reported concerns.
- Documentation and process management through our Integrated Management System (IMS).

This statement for the financial year ended 31 December 2024 is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's anti-slavery and human trafficking statement.

The statement was approved by the Board of Directors on 30th June 2025.



Steve Longdon
Chief Executive Officer
FCC Environment (UK) Limited

Date: 30th June 2025

Anti-Slavery and Human Trafficking Statement Financial Year End 2024

Company	Registration Number	Company	Registration Number
3C Holdings Limited	03610048	FCC Waste Management Limited	03588422
3C Waste Limited	02632581	FCC Waste Services (UK) Limited	00988844
Allington Energy Networks Limited	14878928	FCC Wrexham PFI (Phase II Holding) Limited	08164670
Allington O&M Services Limited	02464345	FCC Wrexham PFI (Phase II) Limited	08164693
Allington Waste Company Limited	04792815	FCC Wrexham PFI Holdings Limited	05567332
Anti-Waste (Restoration) Limited	02993753	FCC Wrexham PFI Limited	05572555
Anti-Waste Limited	01569257	Finstop Limited	03188850
Arnold Waste Disposal Limited	00930757	Green Energy Finance Solutions Limited	12763575
BDR Property Limited	02250123	Green Recovery Projects Ltd	12749606
BDR Waste Disposal Limited	02692495	Hykeham O & M Services Limited	07418624
Beacon Waste Limited	02650198	Integrated Waste Management Limited	02433703
Biowise Limited	04305295	J & B Bio Limited	09040234
Crossco (1370) Limited	09067733	J & B Recycling Limited	02905505
Crossco (1371) Limited	09067739	Kent Conservation & Management Limited	04045661
Darrington Quarries Limited	00579409	Kent Energy, Ltd.	03146731
Derbyshire Waste Limited	02666323	Kent Enviropower Limited	02894377
East Waste Limited	02629972	Landfill Management Limited	02069821
FCC (E&M) Holdings Limited	10326352	Lincwaste Limited	02668959
FCC (E&M) Limited	10327359	Mercia Waste Management Limited	03525188
FCC (Gloucestershire) Holdings Limited	08301883	Norfolk Waste Limited	03001490
FCC (Gloucestershire) Intermediate Limited	08301896	Pennine Waste Management Limited	03057012
FCC (Gloucestershire) Investments Limited	07902692	Re3 Holding Limited	05663732
FCC (Gloucestershire) Limited	08301902	Re3 Limited	05663734
FCC Buckinghamshire (Support Services) Limited	08255628	Severn Waste Services Limited	03618688
FCC Buckinghamshire Holdings Limited	07775848	UBB Waste (Essex) Limited	07984024
FCC Buckinghamshire Limited	07776674	Waste Recycling Group (Central) Limited	04000033
FCC Energy Holdings Limited	12763603	Waste Recycling Group (Scotland) Limited	SC210275
FCC Energy Limited	11338743	Waste Recycling Group (UK) Limited	02563475
FCC Environment (Berkshire) Limited	05663735	Waste Recycling Group (Yorkshire) Limited	02436946
FCC Environment (Lincolnshire) Limited	07418620	Wastenotts (Reclamation) Limited	02674169
FCC Environment (UK) Limited	02902416	Wastenotts O&M Services Limited	02629246
FCC Environment Developments Limited	10325758	Wastewise (UK) Limited	04241935
FCC Environment Limited	02830895	Wastewise Holdings Ltd	11109687
FCC Environment Lostock Limited	11781645	Wastewise Limited	07061094
FCC Environment Services (UK) Limited	02375726	Welbeck Waste Management Limited	02736095
FCC Lostock Holdings Limited	11781540	WRG (Midlands) Limited	SC043286
FCC O&M Services Limited	07888606	WRG (Northern) Limited	SC098678
FCC PFI Holdings Limited	05567306	WRG Acquisitions 2 Limited	05056437
FCC Recycling Limited	2674166	WRG Environmental Limited	2206141