



# Renewi plc

## Modern Slavery Statement 2021

### Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 (the “Act”). It sets out the steps taken by Renewi plc (the “Company”) and our other group companies (the “Group”) during the financial year ending 31 March 2021 to prevent Modern Slavery or human trafficking in our own operations and supply chains.

Modern Slavery is a term used to encapsulate offences in the Act and takes various forms such as slavery, servitude, forced labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. Businesses must be aware of the risks of Modern Slavery, not only ensuring there are appropriate working conditions within their own business, but also satisfying themselves that there is no Modern Slavery within its supply chain, plus taking appropriate action where necessary.

Renewi takes a zero tolerance stance on Modern Slavery. Ensuring the health, safety and wellbeing of our colleagues is a top priority and is at the core of our approach. The Board seeks to continue to reinforce this throughout Renewi’s operations and supply chains. Should any member of staff, supplier or Service Provider act to the contrary, the Board of Renewi plc (the “Board”) will not hesitate to take appropriate measures.

Through identifying potential and actual risks, then adopting measures to combat such, the Board is confident, as far as possible, that there are and will continue to be sufficient measures and controls in place to discourage and deter Modern Slavery within our own business and those of our suppliers. Renewi’s policies reflect our commitment to acting ethically and with integrity in all of our business relationships. However, we acknowledge that we must remain vigilant to the risks and ensure that our suppliers and Service Providers understand and play their part in ensuring that Modern Slavery and human trafficking does not occur in our own operations or supply chains.

Where necessary, we look to further strengthen controls throughout our business and our wider supply chain and seek to develop Renewi’s policies in line with best practice and continuous improvement principles.

For the purposes of this statement “Renewi” refers to all group companies of Renewi plc. Appendix 1 lists the companies within the Group.

### **1. Our Organisation**

Renewi is a leading waste-to-product company, with deep expertise and an extensive breadth of waste management products and services. We exclusively focus on extracting value from waste and turning it into new materials rather than on its disposal through mass burn incineration or landfill. Operating across three business divisions (Commercial, Mineralz & Water, and Specialities), Renewi handles over 12 million tonnes of waste a year, of which 90% is either recycled or used for energy recovery and employs over 6,500 individuals in the UK and Europe.

Our six core values provide the foundations for everything we do at Renewi and differentiates us from our competitors. We believe that how we act is just as important as what we do. Our values underpin Renewi's commitment to run our business in a way that makes a positive contribution to our colleagues, customers and communities; including playing our part in eradicating Modern Slavery.

Furthermore, Renewi subscribes to the 10 principles of the UN Global Compact, an international initiative by the United Nations to promote improved human rights, working conditions, environmental protection and anti-corruption. Businesses, including Renewi, that subscribe to these 10 principles commit to the following:

### **Human Rights**

Principle 1: support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

### **Labour**

Principle 3: uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: promote the elimination of all forms of forced and compulsory labour;

Principle 5: promote the effective abolition of child labour; and

Principle 6: promote the elimination of discrimination in respect of employment and occupation.

### **Environment**

Principle 7: support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### **Anti-Corruption**

Principle 10: work against corruption in all its forms, including extortion and bribery.

These core values and principles form the basis of Renewi's [Code of Conduct](#), which applies to all employees, agency workers, interns and individuals working for the Company on a contractual basis. The Code of Conduct outlines the conduct expected of individuals working for Renewi but also what these individuals can expect from Renewi.

## **2. Annual Review and Steps Taken**

This Statement is reviewed annually by the Board of Renewi plc and was approved for publication on our website and for submission to the Modern Slavery Statement Registry in September 2021.

We published our first Modern Slavery Statement in May 2017. Since then Renewi has focused on strengthening the approach to the prevention of Modern Slavery within the Renewi business and supply chains, particularly in the areas of greatest risk.

## Summary of Steps taken by Renewi in 2020/21

- In 2020/21 there was continuation of our approach to anti-slavery, paying particular attention to roll-out into the Benelux. A meeting was held with NGO, Hope for Justice, to better understand the risks specific to the waste sector, followed by a preliminary assessment of Renewi's supply chains. Specifically, the review included a focus on the use of short-term temporary labour, an area of higher risk for the waste sector, as indicated in the case of Operation Fort. The assessment has given Renewi a good understanding of the numbers and size of suppliers, as well as the types of labour supplied, enabling the formulation of a plan of actions to further mitigate the risks modern slavery, such as:-
  - Designing awareness campaigns tailored for the Benelux, noting that Modern Slavery is not so widely understood within the Benelux;
  - Contacting suppliers to request information about policies and set out our future expectations in relation to Modern Slavery, with a view to reducing suppliers of temporary labour to a shorter list of trusted suppliers;
  - Carrying out further deep dives into the higher risk areas in the Netherlands, such as housing of workers and the agencies that recruit from higher risk countries;
  - Carrying out supplier audits; and
  - Amending purchase terms of suppliers.

This plan of actions is being executed by a dedicated project team (Modern Slavery Working Group) and sponsorship group. The outcome of these new actions will enable a more robust tackling of some of the other outstanding planned steps to be taken, such as, the group-wide roll out of training and awareness campaigns and use of the Modern Slavery Assessment Tool to review the overall action taken by the Group.

- During the year the effectiveness of the Modern Slavery Working Group (MSWG) was reviewed and the MSWG membership refreshed, establishing a more agile MSWG with fewer members (HR, Legal, Communications and Procurement), and the MSWG Chaired by the Human Resources Director. The addition of a sponsorship group comprised of members from each division is hoped to facilitate completion of actions within the Benelux, maintaining an action list to be reviewed at each MSWG meeting.
- Following on from the campaign held in October 2019, Anti-slavery day was marked with another awareness campaign in the UK, including posters and internal announcements.
- The Group-wide global 'Source to Pay' system was successfully rolled out in the Commercial Waste Belgium Division. The new Source to Pay system improves our control and monitoring of our supply chain.
- Renewi plc voluntarily submitted the Modern Slavery Statement to the new UK Government modern slavery statement registry.

## Planned steps to be taken by Renewi in 2021/22

- Over 2020/21 Renewi has made significant progress with anti-slavery in the Benelux. This will continue into 2021/22, unifying the work in the UK and Benelux, with the ambition of eventually having one single Group-wide approach to Modern Slavery.
- The execution of the plan of actions regarding the risk related to the supply of short-term temporary labour (as set out above) will be continued, focussing on:
  - Designing awareness campaigns tailored for the Benelux;
  - Obtain information from suppliers of temporary labour in order to assess the options to reducing suppliers of temporary labour to a shorter list of trusted suppliers;
  - Carrying out further deep dives into the higher risk areas in the Netherlands;
  - Carrying out supplier audits; and
  - Amending purchase terms of suppliers
- There will be another Anti-Slavery Day awareness campaign held on 18 October 2021.
- The Group-wide global 'Source to Pay' system will be fully implemented by the end of 2022.
- In 2021/22 the Group will introduce a Modern Slavery Policy.
- In 2022/23 the Group will conduct a series of deep dive audits with its suppliers of temporary labour.

### 3. Our business and supply chains

The Board acknowledges that the increased size of the Company following the merger of Shanks Group plc (“Shanks”) and Van Gansewinkel Groep B.V. (“VGG”) in February 2017, has increased the exposure of Renewi to the risks of Modern Slavery. Since the merger there has been a rationalisation of the Group structure, helping us understand and refine the structure, and helping reduce the risk of Modern Slavery within Renewi.

Renewi regularly uses agency labour procured through third party providers and sources materials and waste for our business through external businesses. The majority of our suppliers are UK or EU companies.

Having undertaken a risk assessment, we have concluded that the greatest Modern Slavery risks lie within our supply chains and that we would benefit from a higher degree of oversight in relation to our indirect suppliers and contractors, where the Modern Slavery risk is deemed higher. Renewi remains committed to identifying such potential risks and responds appropriately.

Our UK and Benelux divisional procurement teams work closely with all of our suppliers and Service Providers. Where possible, we build long-standing relationships with these parties, making clear our expectation that suppliers and Service Providers take the same Anti-Slavery and Human Trafficking stance as Renewi and take reasonable steps to ensure the same is adhered to within their own supply chains.

All suppliers of labour, goods and services to Renewi must comply with relevant legislation and international standards as relevant to their industry, including child and forced labour, health and safety of workers, non-discrimination, employment law, human rights, fraud, bribery and corruption. Where required by law, suppliers and Service Providers must produce an Annual Modern Slavery Statement pursuant to section 54(1) of the Modern Slavery Act 2015.

Renewi takes action to ensure that suppliers comply with Renewi’s policies by screening significant suppliers on sustainability issues, including human rights and labour standards.

We are currently in the process of implementing a Group-wide global ‘Source to Pay’ tool which will improve our control and monitoring of our supply chain as Renewi grows and evolves. There are further control mechanisms in the yearly Supplier Audits, carried out by external auditors, as part of our ISO certification. Additionally we are in the process of selecting a comprehensive HR System that will integrate legacy personnel administration systems from across the Group. This will also facilitate improved management of data on our temporary/ flexible workforce and help establish efficient processes to enable our suppliers and managers to collect appropriate data. In the tender process for the new HR System we have made external workforce management a key selection topic.

In our own operations, the majority of our colleagues are employed on permanent contracts. In 2018/19 Group payment and employment practices were harmonised as part of the post-merger rationalisation. However, we recognise the risks that have been highlighted in light of Operation Fort, the largest Modern Slavery and Human Trafficking case to go through the British courts, where victims were found working as short-term temporary staff for some of the UK’s most well-known waste companies. Renewi operates a preferred supplier list for the provision of direct temporary labour, contract workers and the recruitment of new employees. We only work with recruitment agencies that share our stance against all forms of Modern Slavery. Any Health, Safety and Environmental breaches or incidents by or involving Service Providers or temporary staff is reported to the Board and appropriate action taken.

Should any indicators of Modern Slavery be identified, we would work with our suppliers to investigate and where appropriate, report to the necessary authorities. Should Renewi consider a supplier or Service Provider has failed to comply with any of the above, we will undertake review of the supplier or Service Providers contract, resulting in appropriate action being taken for any breach, up to immediate termination of the contract.

## 4. Our Staff

Ensuring the health, safety and wellbeing of our colleagues is crucial to Renewi's success and this responsibility is taken very seriously. Our people are crucial to our continued success. Their dedication and commitment to our 'waste no more' goal is one of the key reasons our customers choose to work with us. This is why the health, safety, wellbeing and engagement of our people is a top priority for Renewi. This starts with making sure our colleagues go home safely every day.

All colleagues must adhere to Renewi's Code of Conduct, and our Company policies including Bullying and Harassment, Disciplinary, Equal Opportunities and Grievance. Our Code of Conduct includes reference to laws such as the Modern Slavery Act 2015, setting out our expectations, and detailing how suspected instances of Modern Slavery should be reported to our Integrity Team through the 24/7 confidential whistle-blowing hotline. Our policies are clearly defined and communicated. Our colleagues are treated fairly and equally and are paid at least the national minimum wage and Renewi complies with our obligations under the Working Time Regulations.

To raise awareness of Modern Slavery and trafficking and of our policies and procedures, an e-learning training model has been developed to train colleagues in the UK with responsibilities for people management and recruitment. In the future this will also include e-learning in the Benelux, as our approach towards Modern Slavery is further rolled-out into the rest of the Group. Further to this, every October, as part of Anti-Slavery Day, we hold an annual Group-wide awareness campaign to help our staff understand how to recognise and report instances of Modern Slavery. We also raise awareness of Renewi's zero tolerance approach to Modern Slavery through our Group Magazine and other communication platforms.

In 2019 Renewi recruited a Modern Slavery Working Group to help drive a more unified approach to Modern Slavery. The working group is comprised of members from across the Group and will help drive forward Renewi's approach to Modern Slavery, and where required, making recommendations to the Board over its Modern Slavery obligations. A primary focus for this group has been to promote awareness in the various countries in which we operate, recognising the varying levels of awareness around the risk of Modern Slavery within those countries. This will include training for our managers and communication campaigns to create awareness amongst employees.

All sites are overseen by competent management teams to ensure optimum control of the work environment.

## 5. Other

The following Companies within the Group, that are eligible to publish a statement under Section 54(1) of the Act, have adopted this Group statement:-

- Renewi UK Services Limited.

This statement has been approved by the Board of Renewi plc, who will review and update it annually.

Signed



**Otto de Bont**  
Chief Executive Officer,  
Renewi plc 30 September 2021

### **Appendix 1 – Subsidiary undertakings as at 31 March 2021**

Please see note 8.1 on page 202 of the Renewi plc Annual Report and Accounts 2021, downloadable from the link below, for a full list of the subsidiary undertakings:

<https://www.renewi.com/en/investors/investor-relations/reports-and-presentations>