

# Modern Slavery & Human Trafficking Statement

## Introduction

This statement sets out the actions that Grundon Waste Management Ltd. (Grundon) has taken during the financial year 1<sup>st</sup> October 2022 to 30<sup>th</sup> September 2023 to identify all potential modern slavery risks related to the business and the provisions made to ensure there is no slavery or human trafficking within the business or our supply chain.

As part of the Waste & Recycling sector, we recognise the risks of modern slavery and human trafficking associated with our industry and understand our responsibilities to take a robust approach to slavery and human trafficking. Grundon is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that our supply chains are free from slavery and human trafficking.

## Organisational Structure & Supply Chain

Directly employing over 800 people, Grundon operates from 12 sites solely within the United Kingdom, predominantly in the South of England, providing a total waste management service for the reduction, reuse, recycling, recovery and disposal of waste, delivered via a combination of specialist services, contract management and the operation of our own facilities.

Our supply chain includes other waste and recycling businesses, as well as a number of businesses who supply goods and services to Grundon. Additionally, we supplement our own workforce with labour procured through third-party providers, and although we have steps in place to ensure third-party labour providers are assessed against their obligations in relation to the Modern Slavery Act 2015, we recognise that the provision of labour through these third parties presents a higher risk.

## Policies

Grundon operate the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

### Recruitment Policy

Our Recruitment Policy sets out how we conduct our recruitment process, including carrying out relevant checks to ensure as far as possible, that an individual is not subject to human trafficking or modern slavery.

### Selection & Approval of Recruitment Agencies and Suppliers (Temporary Labour), and Selection & Approval of Contractors and Suppliers

We are committed to ensuring that our suppliers adhere to the highest standards of ethics.

Recruitment Agencies and Suppliers who provide labour to Grundon are required to provide examples of how they adhere to their obligations towards preventing modern slavery and human trafficking, and outline their recruitment and selection methods, through our compliance questionnaire. Where Managed Service contracts are in place, we ensure that there are provisions within the contracts that stipulate our expectations towards the recruitment and employment of workers, including the use of second-tier suppliers.

All appropriate suppliers and contractors are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Any contractor or supplier, including recruitment agencies and labour providers, who acts in an unlawful manner will have their contract terminated immediately and will be removed from the Company's approved supplier system.

Our Compliance and Human Resources teams periodically review our policies and procedures as our knowledge and understanding of the risks of modern slavery and human trafficking develops.

# Modern Slavery & Human Trafficking Statement

## Steps Taken to During the Reporting Period

### Managed Service Provider

Grundon engage with a third-party supplier to provide a Managed Picking Service at three of our recycling locations: Colnbrook near Heathrow, Leatherhead in Surrey and Bishop's Cleeve near Cheltenham. As indicated in our Modern Slavery & Human Trafficking Statement in 2023, Grundon appointed a new supplier, ALS People, with their contract commencing in February 2023. TUPE consultation and transfers were undertaken with a number of workers from the previous incumbent transferring to ALS People.

ALS People completed several initiatives during the consultation period and post transfer, to identify any risks of exploitation. These checks include welfare interviews, Modern Slavery training, Tool Box Talks, posters and communications, Right to Work checks and address checks on all workers. Random checks have also been completed during the year by ALS management independent of the on-site team. All workers have access to confidential whistleblower helplines as well as external support from Unseen UK, Stronger Together and Hope for Justice. Collaborative initiatives have been planned for 2024 and beyond to ensure a joined-up, strategic approach to promote the wellbeing and safety of the workforce.

During 2023, we continued to engage with Fast Forward, part of Stronger Together, and have commissioned a Fast Forward labour standards audit of ALS People to take place in early 2024.

### Grievance & Whistleblowing Policy & Procedure roll-out

Our Grievance Policy and Procedure was reviewed in July 2023, and included additional procedures around Whistleblowing, including the introduction a confidential, internal hotline for employees to anonymously and confidentially raise concerns. Details of this new procedure was communicated to employees via Tool Box Talks.

### Commitments for 2023/24

- Further develop procedures, processes and awareness in order to better assess the risks of a supplier or contractor in relation to preventing modern slavery and human trafficking.
- Further develop policies and procedures to ensure our own internal processes support best practice in relation to preventing modern slavery and human trafficking.
- Conduct further reviews of our supply chains.

### Board Approval

This statement is published on our Company website and will be reviewed annually to ensure ongoing compliance and with our obligations under the Modern Slavery Act 2015 and has been reviewed and approved by the Board of Directors.



Clayton Sullivan-Webb  
Managing Director  
26<sup>th</sup> February 2024

