

# Modern Slavery and Human Trafficking Statement

## Introduction

This statement sets out the actions that Grundon Waste Management Ltd. (Grundon) has taken during the financial year, 1st October 2024 to 30th September 2025 to identify all potential modern slavery risks related to the business and the provisions made to ensure there is no modern slavery or human trafficking within the business, our agency partners, contractors, or supply chain.

As part of the Waste and Recycling sector, we recognise the inherent risks of modern slavery and human trafficking within our industry and understand our responsibility to take a strong and proactive stance against them. Grundon is fully committed to preventing modern slavery and human trafficking across all our operations and to ensuring that our contractors and supply chains uphold the same high standards.

## Organisational Structure and Supply Chain

Grundon operates from 13 sites solely within the United Kingdom, predominantly in the South of England. Directly employing over 850 people, to provide 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 several 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 procedures and 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 in relation to Modern Slavery and Human Trafficking

Our Compliance and People teams regularly review our policies and procedures. To support our approach to identifying these risks and to outline the actions required to prevent modern slavery and human trafficking within our operations, Grundon maintains the following policies -

### Recruitment Policy

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

### Selection and Approval of Recruitment Agencies and Suppliers (Temporary Labour), and Selection and 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 comprehensive 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, this policy and procedure was reviewed by our People and Compliance teams in December 2025. 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.

# Modern Slavery and Human Trafficking Statement (continued)

## Grievance and Whistleblowing Policy and Procedure

Our Grievance Policy and Procedure was reviewed in December 2025 by our People team and Compliance team, details of this procedure are communicated to new employees via Grundon's robust induction program, within this program additional procedures around Whistleblowing are covered, including the company's confidential, internal hotline for employees to anonymously and confidentially raise concerns, this procedure and policy is also displayed in all sites via TV screens and posters. We also cover these policies and procedures with existing employees via Toolbox Talks.

## Equality and Diversity Policy and Procedure

Our Equality and Diversity Policy and Procedure was reviewed in December 2025 by our People and Compliance teams. Grundon believes that every employee regardless of whether they are directly or indirectly employed (through a third party) has the right to be treated with dignity and respect as an individual within an environment that supports them. Grundon is therefore committed to promoting equal opportunity and preventing unlawful or unjustifiable discrimination. Details of this policy and procedure are communicated to employees via Toolbox Talks, and through the robust new employee induction program.

## Due Diligence Process of the Managed Service Provider

Grundon continues to partner with a third-party supplier, namely ALS Managed Services Limited, and have done so since February 2023, to provide a Managed Picking Service at three of our recycling locations: namely Colnbrook near Heathrow Slough, Leatherhead in Surrey and Bishop's Cleeve near Cheltenham.

ALS Managed Services are bound by our robust Selection and Approval of Recruitment Agencies and Suppliers (Temporary Labour), and Selection and Approval of Contractors and Suppliers, and ALS Managed Services Ltd checks, include welfare interviews, Modern Slavery training, Toolbox Talks, posters and communications, Right to Work checks and address checks on all workers. At every site there is an ALS supervisor who supports the ALS employees and has regular contact with both ALS and Grundon site supervisors. When Grundon operational and support teams visit sites with ALS employees, check ins also take place with the team.

Random checks by ALS management, are conducted during the year, and who are independent of the on-site team. All workers have access to confidential whistleblower helplines as well as external support from Slave Free Alliance, Unseen UK, Stronger Together and Hope for Justice. Collaborative initiatives are further planned for 2026 and beyond to ensure a joined-up, strategic approach to promote the wellbeing and safety of the workforce.

Throughout 2025, we continued our partnership with Fast Forward, part of the Stronger Together initiative, and we plan to explore additional collaborators, such as Slave Free Alliance, in 2026. We are also currently reviewing the terms of business and contractual arrangements we hold with ALS.

## Risk Assessment and Management

Risk assessment and management of agency workers in relation to modern slavery and human trafficking is crucial for ensuring ethical and legal compliance. ALS Managed Services Ltd consult closely with Grundon to ensure confidence that they are conducting thorough risk assessments to identify potential vulnerabilities within their supply chains and employment practices. This involves evaluating the recruitment processes, working conditions, and contractual agreements of agency workers to detect any signs of forced labour or exploitation. Implementing robust management strategies, such as regular audits, employee training, and clear reporting mechanisms.

# Modern Slavery and Human Trafficking Statement (continued)

## Key Performance Indicators to Measure Effectiveness of Steps Being Taken

Working closely with ALS Managed Services Ltd we have tracked the corrective actions following the 2024 Fast Forward audit, and the compliance rate with ethical recruitment practices are crucial metrics. Regularly reviewing and analysing these KPIs helps us, and ALS Managed Services Ltd identify areas for improvement, ensuring we continuously progress in combating modern slavery and human trafficking.

## Training on Modern Slavery and Human Trafficking

We have been trialling a new learning management system (LMS) at our Bishop's Cleeve site near Cheltenham, and this will be rolled across the entire estate in 2026, within this is online training on modern slavery and human trafficking awareness, which will be made available to all colleagues. In 2026 we will explore partnering with Slave Free Alliance to enable in depth refresher training for managers and supervisors across the business.

## Commitments for 2025/26

- Deliver in depth training for Managers and Supervisors on Modern Slavery and Human Trafficking.
- Roll out training on modern slavery and human trafficking awareness through the introduction of a new learning management system (LMS).
- Explore further partnerships with specialist organisations to support us further in identifying, prevention, and address modern slavery and labour exploitation in our operations and supply chains.
- Continue to conduct reviews of our supply chains and contractors.
- Continue to review all relevant policies.

## 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

12 January 2026

