

# Modern Slavery Statement

September 2018





# Modern Slavery Statement - September 2018

This statement sets out Biffa's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year ending 30 March 2018.

## 1. Introduction

Slavery, servitude, forced labour and human trafficking (Modern Slavery) is a world-wide and growing issue given the rapid rise in global migration. The sector in which we operate can be attractive to perpetrators of this type of crime so as a leading integrated waste management and recycling business in the UK, the company recognises the need to adopt a robust approach to slavery and human trafficking. Biffa has a zero tolerance approach to Modern Slavery of any kind within our operations and supply chain and staff are expected to report concerns, using the appropriate reporting channels, and we are committed to act upon any such reports.

For statutory reporting purposes this statement relates to Biffa Waste Services Limited and Biffa Municipal Limited but the same policies and procedures are extended across all operations within Biffa plc.

## 2. Organisational structure and supply chains

Established in 1912 Biffa operate at over 190 sites across the United Kingdom providing, waste collection, recycling, treatment and energy generation services. Our business headquarters are in High Wycombe, UK and we employ about 7,900 people across the group.

We have relationships with external businesses to source labour and materials/waste for our business. The majority of our suppliers are UK companies.

We procure under the Code of Ethics of the Chartered Institute of Procurement & Supply. Suppliers of goods and services to Biffa must comply with all 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.

In the past year we have increased our focus on Modern Slavery within our wider business operations, and the supply chains. Having reviewed our supply

chain we have identified the provision of labour through managed service contracts and recruitment agencies as a potential area of risk.

We maintain regular contact with our managed service providers through onsite Account Managers and hold regular meetings to discuss their actions in regard to preventing modern slavery in their business. In their statement our managed service provider advises that they are 'committed to the highest standards of ethical conduct and integrity in its business activities and has a zero tolerance policy against slavery and human trafficking.'

As part of this commitment they are pursuing membership of Stronger Together Partners (<http://stronger2gether.org/>) who provide guidance, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation.

## 3. Relevant policies and practices

Biffa has in place the following policies and practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Anti-Slavery and Human Trafficking policy and procedure** - reiterating our stance against all forms modern slavery, the policy outlines our procedures and processes which are designed to guard against the occurrence of modern slavery or human trafficking in our business operations and supply chain.
- **Whistleblowing policy and procedure** - encourages our employees to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our independently provided whistleblowing hotline provides an easy and

confidential means for concerns and allegations to be raised. We investigate every whistleblowing case and seek to achieve resolution within the shortest possible timescales.

- **Employee Assistance Programme** – provides an external and confidential support service by telephone through which advice and information are imparted to employees across a wide range of topics.
- **Supplier code of conduct** - Biffa insists on ethical standards from all of our suppliers. Suppliers are required to confirm that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **Recruitment policy and procedure** - Biffa operate a preferred supplier list, and works only with recruitment agencies which share our commitment towards anti-slavery and the prevention of human trafficking.

## 4. Due diligence

The company undertakes due diligence when considering taking on acquisitions, new suppliers, and also regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new acquisition
- Reviewing the supply chain broadly to assess particular product, sector or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier;

## 5. Training and Awareness-raising Programme

- We work with 'Hope for Justice' (<http://hope-forjustice.org/united-kingdom/>), an international anti-human-trafficking charity, to provide a programme promoting awareness of modern slavery. This has been prioritised in the areas of our business operations where the risk of modern slavery practices have been assessed to be the greatest and includes:
- General training and awareness of modern slavery for line managers, team leaders and supervisors
- The distribution of a multilingual employee newsletter and posters
- Workshops, with multilingual outreach workers who attend site and speak directly to staff and workers onsite
- Regular review meetings with our managed service and agency workers provider

## 6. Progress Report and Targets for 2018-19

### 6.1. Overall Progress Report for 2017-18:

There have been no reported instances of modern slavery / human trafficking relating to Biffa employees in the year ending 30 March 2018. However in September 2017 we received a whistle blower report alleging modern slavery practices amongst third party agency personnel of a business we acquired in July 2017. We engaged a third party expert to conduct a full audit and risk assessment of the operation. As a result of this exercise the third party resource provider cancelled the assignments of two of its agents, and they no longer work at any of our sites. Biffa has also implemented the recommendations arising from the audit / risk assessment and is working on an ongoing basis with the third party resource provider to ensure no re-occurrence of these activities is likely to arise again.

### 6.2. Provide general training and awareness to line managers, team leaders and supervisors:

2017-18 Progress	2018-19 Target
<ul style="list-style-type: none"> <li>• Developed and deployed an e-learning module on modern slavery.</li> <li>• The module describes and gives examples of modern slavery practices, highlights the role in preventing modern slavery and makes employees aware of the Company's modern slavery policy.</li> <li>• The module was launched to a pilot group of line managers between December 2017 and March 2018.</li> </ul>	The e-learning module will be transitioned to our new learning management system and then launched to senior and middle managers across the group by December 2018.

### 6.3. Complete modern slavery due diligence / risk assessments on acquisitions

2017-18 Progress	2018-19 Target
<p>In October 2017 we engaged Hope for Justice to conduct a risk assessment of our newly acquired O'Brien Waste Recycling Solutions Ltd (O'Brien). Actions taken include :</p> <ul style="list-style-type: none"> <li>• Linking the Biffa modern slavery statement to the website of acquired companies.</li> <li>• Modern slavery awareness and training programme deployed to all key staff and agency staff.</li> <li>• Our confidential whistle-blowing hot line has been promoted within acquired sites.</li> </ul>	Any acquisitions completed in 2018-19 will have a modern slavery risk assessment conducted, and appropriate training / awareness and reporting mechanisms will be considered and deployed as necessary. Biffa modern slavery policy to be implemented as soon as practicable.

### 6.4. Complete modern slavery due diligence / risk assessments on suppliers

2017-18 Progress	2018-19 Target
<ul style="list-style-type: none"> <li>• As from 1st April 2017 all new suppliers have to successfully complete the modern slavery and human trafficking questionnaire, as part of procurement due diligence processes.</li> <li>• During 2017-18 all existing suppliers were asked to complete our modern slavery and human trafficking questionnaire in order to retain their status of an approved and active supplier to the company.</li> </ul>	<p>Review the procurement modern slavery questionnaire to ensure it continues to reflect best practice, and continue to use it as part of the overall procurement new supplier on-boarding processes</p> <p>To review the existing suppliers of any businesses acquired in 2017/18 and ask them to complete the procurement modern slavery questionnaire.</p>

**This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the Biffa anti-slavery and human trafficking statement for the financial year ending 30 March 2018.**

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

A handwritten signature in dark blue ink, appearing to read 'M Topham', with a long horizontal flourish extending to the right.

**Michael Topham**  
**Chief Executive Officer, Biffa**  
**30 September 2018**