



# Modern Slavery Statement 2021



**SLAVE-FREE  
ALLIANCE**  
Working Towards a  
Slave-free Supply Chain



Part of Hope for Justice, a registered charity.  
**HOPE FOR JUSTICE**  
Change lives. End slavery.

## July 2021 – A message from our Chief Executive Officer

At Viridor we have a zero-tolerance approach to modern slavery and are committed to combatting the risks of modern slavery and human trafficking in every area of our business.

We recognise that some areas of our operations, such as the use of agency labour, may be more susceptible to human trafficking and slavery. Our strategy includes ensuring we have adequate resources, processes, and safeguards in place to protect all employees (direct or agency workers) from the risks of modern slavery; and are working closely with providers to verify their existing processes and to develop our own risk assessment and rigorous monitoring programme.

There have been challenges to the delivery of our programme, the most notable and prominent being the Covid-19 virus and resulting lock-down. However, we will continue to overcome this and any other obstacles that fall in our path.

There is still some way to go but we will continue to build on our achievements over the coming year.

A handwritten signature in black ink, appearing to read 'Kevin Bradshaw', with a long horizontal flourish underneath.

Kevin Bradshaw  
Chief Executive Officer



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## Viridor at a glance

Viridor's businesses are all UK based and have all adopted this Statement. A list of these companies can be found on page 6.

- Employs around 3,000 people.
- Works in partnership with local authority and major corporate clients.
- Has a large customer base across the UK.
- Has the UK's largest network of 300+ advanced recycling, energy recovery and landfill diversion facilities.
- Is one of the UK's largest independent power generators from waste.

As a leading UK waste management, recycling and energy recovery company, Viridor takes the waste that British homes and businesses throw away and transforms it into essential quality materials, resources and energy for customers across the UK and globally. Viridor employs over 3,000 people in its operations at over 300 sites across the UK.

Viridor works in partnership with more than 150 local authorities and major corporate clients, with 32,000 customers over the UK. In order to deliver its services, Viridor has

the UK's largest network of over 300 advanced recycling, energy recovery and landfill diversion facilities, with a waste collection service of more than 600 vehicles.

Viridor works closely with the communities it serves and has 11 educational centres at sites across the UK. In addition to its educational work, Viridor funds work within the community and runs a variety of charitable donation schemes.

### During the year:

We have continued to develop our approach for the implementation and delivery of our modern slavery programme.

This has been done through the delivery of awareness training to key employees and the review and modification of our policies.

Our site visits have been hampered this year due to Covid-19, but our operational audit team are still carrying out visits in accordance with any lock-down restrictions and as restrictions ease, we will be resuming site visits.

The rationalisation of our supplier base has continued and a new onboarding process for all suppliers has been launched, establishing greater governance and control over new supply chain relationships, including highlighting which suppliers are obligated to publish a Modern Slavery Annual Statement

Where Viridor's own terms and conditions are used, a clause dedicated to 'compliance with relevant laws and policy' addresses the Modern Slavery Act 2015.

### Employment Agency

We continue to work with Smart Solutions to lead the supply of temporary staff across the national footprint of locations. Smart Solutions provide further safeguards by conducting audits of their staff employed at Viridor sites.

All temporary staffing arrangements are now provided or coordinated by Smart Solutions therefore all second-tier suppliers are required to adhere to their strict compliance when onboarding and inducting.

## **Looking Forward:**

### **Employee Engagement**

Employee engagement is critical to the success of any awareness training, and Viridor will investigate different ways to engage with staff and explore which types of training and methods of delivery are most effective and appropriate for the target audience.

### **HR and Employee Related**

During the year Viridor will continue with its review and enhancement of its own onboarding process.

### **Supply Chains and Procurement**

Projects that were underway or about to begin, continue to form part of the works to mitigate the risks of modern slavery in the supply chain for the year 2021/2022.

Viridor will continue the development of the supplier scorecard (questionnaire) which will be tailored to a selection of questions representing key subject areas within Viridor's Code of Conduct for Supply Chain partners.

A formal framework for enhancing supply chain risk and resilience will continue to explore all associated risk factors within supply chain engagement, including the risk of modern slavery across multiple layers within the supply chain.

### **Supporting documents and policies**

Viridor has a number of key policies that are in place across the group to support its strategy on modern slavery. They include:

- Code of Conduct
- Anti-slavery and Human Trafficking Policy
- Code of Conduct for Supply Chain Partners
- Sustainable Procurement Policy
- Whistleblowing Policy

## List of Active Viridor Companies

Viridor Limited  
Registered No: 2456473

Viridor Dunbar Waste Services Limited Registered  
No: SC675860

Viridor South London Limited Registered  
No: 8106962

Viridor Waste Management Limited Registered  
No: 575069

Viridor EFW (Runcorn) Limited Registered  
No: 6864784

Viridor Trident Park Limited Registered  
No: 7977364

Viridor Waste Limited  
Registered No: 2662755

Viridor EnviroScot Limited Registered  
No: SC182926

Viridor Waste Exeter Limited Registered  
No: 1403771

Dragon Waste Limited Registered  
No: 2751860

Viridor Energy Limited  
Registered No: 12873827

Viridor Waste (Greater Manchester) Limited  
Registered No: 2705057

Limone Waste Limited  
Registered No: 13270472

Viridor (Glasgow) Limited Registered  
No: SC404681

Viridor Waste Kent Limited Registered  
No: 2751074

Raikes Lane Limited  
Registered No: 3291202

Viridor (Lancashire) Limited Registered  
No: 05934432

Viridor Waste (Landfill Restoration) Limited  
Registered No: 3411260

Syracuse Waste Limited Registered  
No: 12890930

Viridor Oxfordshire Limited Registered  
No: 7343925

Viridor Waste (Somerset) Limited Registered  
No: 2631783

Viridor Avonmouth Polymers Recycling Limited Registered  
No: 12890930

Viridor Peterborough Limited Registered  
No: 8254147

Viridor Waste (Thames) Limited Registered  
No: 2990277

Viridor Avonmouth Waste Services Limited Registered  
No: 12890930

Viridor Polymer Recycling Limited Registered  
No: 5499464

Viridor Waste (West Sussex) Limited  
Registered No: 4939078

Viridor Clyde Valley Limited Registered  
No: SC525057

Viridor Resource Management Limited Registered  
No: 3649069

Viridor Energy (Investments) Limited  
Registered No: 13513326

Viridor Energy (Investments One)  
Limited Registered No: 13515153

Viridor Energy (Investments Two) Limited  
Registered No: 13520383

Viridor Energy Holding Limited Registered  
No: 13493563

Viridor Energy Holding (One) Limited  
Registered No: 13512859

Viridor Energy (Developments) Limited Registered  
No: 13515350

Viridor Polymer Holding Limited Registered  
No: 13520311

Viridor Waste (HP) Holding Limited  
Registered No: 13492968

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The modern slavery statement is made in accordance with section 54 of the Modern Slavery Act 2015 and represents Viridor's anti-slavery and human trafficking statement for the financial year 2020-21 and was approved by the Viridor Board on 29 April 2021 and the Sustainability and ESG Committee on 23 July 2021.



Kevin Bradshaw  
Chief Executive Officer  
July 2021