



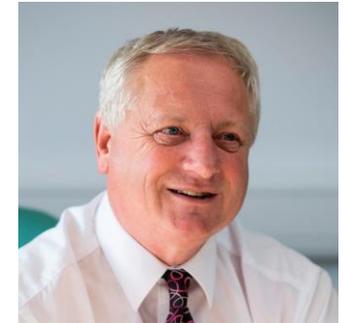
# Modern Slavery Statement 2020



## May 2020 – 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 in 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 program.



Tackling and preventing modern slavery goes beyond a simple legal duty; it is the right thing to do. By setting the tone of how we wish to do business, we want to work with our suppliers, and other organisations, to show them how doing the right thing will not only benefit them and strengthen their operations but will also play a vital part to help eradicate modern slavery.

There is no doubt there will be challenges to the delivery of our programme, the most notable and prominent being from the recent outbreak of the Covid-19 virus and resulting lock down. However, we will continue to innovate and utilise the vast knowledge, expertise and skillset of our workforce, together with Slave Free Alliance, to overcome this and any other obstacles that fall in our path.

We recognise that there is still a long way to go but we are confident we are on the right track and have made significant progress in our programme to prevent modern slavery. Our progress over the past 12 months is documented in this statement and we will continue to build on our achievements over the coming year.

Phil Piddington  
Chief Executive Officer

# Contents

<b>Viridor</b>	4
About Us	
Achievements and Review	5
Achievement and Review Continued	6
Plans for 2020 - 2021	7
List of Active Companies	8



## 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 8.

- 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.
- manages seven million tonnes of recyclates and resources each year with 1.4 million tonnes of recyclate traded.
- is one of the UK's largest independent power generators from waste.

in this statement, reflect those made under its former owners as part of its joint strategy at the time.

Viridor, going forward retains the Slave Free Alliance membership and is committed to mitigating the risk that modern slavery cannot and does not occur anywhere within the company or its supply chain.

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 3000 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 all 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 work 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.

### 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

...and in more detail...

The achievements over the past 12 months detailed

## Achievements and review of 2019/2020 at a glance...

### Training and Awareness

- Implementation and delivery of awareness training to key employees.
- Face to face code of conduct training.
- Progression of work within the remit of the modern slavery working group:
  - Development of a modern slavery standard.
  - Development of a modern slavery standard manager's guide.
  - Development of a modern slavery standard employee guide.

### Management, Resources & Engagement

- Participation in Home Office independent review of legislation in 2019.
- New employment agency with proven expertise in modern slavery.
- Audit rights.
- Site visits and audits.
- Development of risk assessments.
- Close working relationship with Slave-Free Alliance.

### Supply Chains and Procurement

- Rationalisation of supplier base.
- Supplier scorecard questionnaire
- Enhanced onboarding checks for new suppliers.
- Study of overseas suppliers.
- Supply chain risk and resilience framework.

## ...and in more detail...

### Governance, Programme and strategy

Regular updates and reports have been provided to those who are responsible and accountable for the strategy.

Good progress has been made against last year's aims, as indicated by the bullet points to the left.

### Training and Awareness

We, together with Slave-Free Alliance, have developed and implemented a training and awareness programme to key employees across the business. The training has been positively received, with delegates taking the key messages and learning to raise awareness with fellow employees, family and friends.

### Modern Slavery Working Group

Our modern slavery working group has built upon previous work during the year. Membership comprises of employees from all areas of the business.

The working group also came together on 18 October - anti-slavery day 2019, to participate in a charity abseil fundraising and awareness event, raising money for Hope for Justice.

### New Employment Agency

Following a rigorous procurement process, Viridor selected Smart Solutions to lead the supply of temporary staff across the national footprint of locations. They have a reputation as industry leaders with proven expertise and measures in place to help prevent the risk of modern slavery in their supply. Smart Solutions also provide further safeguards by conducting audits of their staff employed at Viridor sites.

All temporary staffing arrangements are now provided or coordinated by our new partner therefore all second-tier suppliers are required to adhere to Smart Solutions' strict compliance when onboarding and inducting. Post separation, this relationship will continue in Viridor, and their performance regarding service and supply will be regularly reviewed and measured against KPIs.



**Achievements and review, in detail, continued...**

## Slave-Free Alliance

Viridor will continue to demonstrate its ongoing commitment to prevent modern slavery through its strong partnership with Slave-Free Alliance (SFA).

Viridor uses SFA expertise to help identify gaps or areas of improvement, through visits to some of its sites. The recommendations derived from these visits have proved to be a valuable resource in helping to enhance measures to prevent modern slavery.

## Supply Chain and Procurement

Viridor continues to reinforce and enhance its processes to address and mitigate the risks of modern slavery within its supply chain. Multi-stage due diligence processes continue to be implemented across a wide range of supply chain management activities. Supplier rationalisation and segmentation exercises continue to support greater governance in the supply chain, which directly impacts supply chain risk identification, including modern slavery.

New projects currently underway illustrate Viridor's approach to modern slavery in practical terms. Although these projects were conceived of and have begun implementation under Pennon's leadership, they are detailed in two

sections of this statement as there is some crossover between achievements of the past year and plans for the next 12-month period. As some of these projects are still in their relative infancy or lead on from the aforementioned exercises and are relevant to Viridor's future endeavors as an independent company and as such these projects will also feature in Viridor's plans for the next 12 months. These projects include:

- 1) Developed framework for a supplier scorecard questionnaire.
- 2) An enhanced supplier onboarding process.
- 3) Desktop review of overseas suppliers.
- 4) Development of a supply chain risk and resilience framework.

A phased issue of a scorecard (questionnaire) will host a selection of questions representing key subject areas within Viridor's Code of Conduct for Supply Chain Partners. This will be issued to identified Strategic and Key suppliers following Viridor's segmentation exercise. This will ensure current selected suppliers working with Viridor are assessed for compliance, which will contain modern slavery focused areas.

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.

A high-level desktop study of Viridor's overseas suppliers is currently in progress and will become a live study as Viridor's supply chain changes.

Research methodology to support this study uses a range of data pools, including Viridor's own e-procurement database and external knowledge sources, such as the Global Slavery Index. If and when high risk suppliers are identified, Viridor will implement a supply chain decision engagement tree which will invoke a structured, standardised way for dealing with high risk scenarios.

A formal framework for enhancing supply chain risk and resilience has begun development, which will explore associated risk factors within supply chain engagement, including the risk of modern slavery across multiple tiers within the supply chain.

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.

## Plans for 2020/2021

### Strategy & Learning

- Continue its membership and partnership with Slave Free Alliance (SFA)
- Continuing to assess modern slavery risks
- Continue to provide a confidential whistleblowing hotline

### Training and Awareness

- Continue awareness training
- Employee toolbox talks
- Working group
- Form strategic partnerships with other organisations to promote best practice.

### Management, Resources & Engagement

- Site assessments
- Site awareness materials, posters
- Risk assessments
- Whistleblowing Helpline
- Enhancement of Policies
- Enhance employee onboarding process
- Employee toolkits

### Supply Chains and Procurement

- Initiate supplier scorecard questionnaire to key & strategic suppliers.
- Further enhance onboarding checks for new suppliers.
- Continue the study of overseas suppliers.
- Implement supply chain risk and resilience framework.

### Continuing to Assess Modern Slavery Risks

This includes:

Learning from site assessments of Viridor premises, conducted with its partners Slave-Free Alliance.

- Working with its employment agency(s) to ensure there are no gaps in Viridor's recruiting and onboarding process for permanent and temporary staff.
- Undertake audits to measure levels of compliance.

### 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 plans to review and enhance its own onboarding process.

### Supply Chain 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 2020/2021.

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.

Viridor will continue to develop, enhance and employ the onboarding process for all new suppliers.

The high-level desk top study for overseas suppliers will continue to form an important part of Viridor's strategy and measures to mitigate the risk of modern slavery in its supply chain.

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.



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## List of Active Viridor Companies

Viridor Limited  
Registered No: 2456473

Viridor (Glasgow) Limited  
Registered No: SC404681

Viridor Waste Exeter Limited  
Registered No: 1403771

Viridor Waste Management Limited  
Registered No: 575069

Viridor (Lancashire) Limited  
Registered No: 05934432

Viridor Waste (Greater Manchester) Limited  
Registered No: 2705057

Viridor Waste Limited  
Registered No: 2662755

Viridor Oxfordshire Limited  
Registered No: 7343925

Viridor Waste Kent Limited  
Registered No: 2751074

Dragon Waste Limited  
Registered No: 2751860

Viridor Peterborough Limited  
Registered No: 8254147

Viridor Waste (Landfill Restoration) Limited  
Registered No: 3411260

Raikes Lane Limited  
Registered No: 3291202

Viridor Polymer Recycling Limited  
Registered No: 5499464

Viridor Waste (Somerset) Limited  
Registered No: 2631783

Viridor Clyde Valley Limited  
Registered No: SC525057

Viridor Resource Management Limited  
Registered No: 3649069

Viridor Waste (Thames) Limited  
Registered No: 2990277

Viridor EFW (Runcorn) Limited  
Registered No: 6864784

Viridor South London Limited  
Registered No: 8106962

Viridor Waste (West Sussex) Limited  
Registered No: 4939078

Viridor EnviroScot Limited  
Registered No: SC182926

Viridor Trident Park Limited  
Registered No: 7977364

**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**

The statement was approved by the Viridor Board on 4 September 2020

Phil Piddington  
Chief Executive Officer  
September 2020