



Renewi plc

Modern Slavery Statement 2023

Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 (the “Act”). It sets out the steps taken by Renewi plc (the “Company”) and our other group companies (the “Group”) during the financial year ending 31 March 2023 to prevent Modern Slavery or human trafficking in our own operations and supply chains.

Modern Slavery is a term used to encapsulate offences in the Act and takes various forms such as slavery, servitude, forced labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. Businesses must be aware of the risks of Modern Slavery, not only ensuring there are appropriate working conditions within their own business, but also satisfying themselves that there is no Modern Slavery within its supply chain, plus taking appropriate action where necessary.

Renewi takes a zero tolerance stance on Modern Slavery. Ensuring the health, safety and wellbeing of our colleagues is a top priority and is at the core of our approach. The Board seeks to continue to reinforce this throughout Renewi’s operations and supply chains. Should any member of staff, supplier or service provider act to the contrary, the Board of Renewi plc (the “Board”) will not hesitate to take appropriate measures.

Through identifying potential and actual risks, then adopting measures to combat such, the Board is confident, as far as possible, that there are and will continue to be sufficient measures and controls in place to discourage and deter Modern Slavery within our own business and those of our suppliers. Renewi’s policies reflect our commitment to acting ethically and with integrity in all of our business relationships. However, we acknowledge that we must remain vigilant to the risks and ensure that our suppliers and Service Providers understand and play their part in ensuring that Modern Slavery and human trafficking does not occur in our own operations or supply chains.

Where necessary, we look to further strengthen controls throughout our business and our wider supply chain and seek to develop Renewi’s policies in line with best practice and continuous improvement principles.

For the purposes of this statement “Renewi” refers to all group companies of Renewi plc. Appendix 1 lists the companies within the Group.

1. Our Organisation

Renewi is a leading waste-to-product company, with deep expertise and an extensive breadth of waste management products and services. We focus on extracting value from waste and turning it into new materials rather than on its disposal through mass burn incineration or landfill. Operating across three business divisions (Commercial Waste, Mineralz & Water and Specialities), Renewi handles almost 11 million tonnes of waste a year, of which 90% is either recycled or used for energy recovery and employs over 6,500 individuals in the UK and Europe.

Our six core values provide the foundations for everything we do at Renewi and differentiates us from our competitors. We believe that how we act is just as important as what we do. Our values underpin Renewi's commitment to run our business in a way that makes a positive contribution to our colleagues, customers and communities; including playing our part in eradicating Modern Slavery.

Furthermore, Renewi subscribes to the 10 principles of the UN Global Compact, an international initiative by the United Nations to promote improved human rights, working conditions, environmental protection and anti-corruption. Businesses, including Renewi, that subscribe to these 10 principles commit to the following:

Human Rights

Principle 1: support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: promote the elimination of all forms of forced and compulsory labour;

Principle 5: promote the effective abolition of child labour; and

Principle 6: promote the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: work against corruption in all its forms, including extortion and bribery.

As a part of global community, Renewi recognizes its obligation to contribute to the UN Sustainable Development Goals. Among them, Goal 8, to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all. Goal 8 determines the actions to be taken including immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

These core values and principles form the basis of Renewi's [Code of Conduct](#), which applies to all employees, agency workers, interns and individuals working for the Company on a contractual basis. The Code of Conduct outlines the conduct expected of individuals working for Renewi but also what these individuals can expect from Renewi.

2. Annual Review and Steps Taken

This Statement is reviewed annually by the Board of Renewi plc and was approved for publication on our website and for submission to the Modern Slavery Statement Registry in September 2023.

We published our first Modern Slavery Statement in May 2017. Since then, Renewi has focused on strengthening the approach to the prevention of Modern Slavery within the Renewi business and supply chains, particularly in the areas of greatest risk.

Summary of Steps taken by Renewi in 2022/23

- In 2022/23 there was continuation of our approach to anti-slavery, paying particular attention to roll-out into the Benelux. The main area of focus remained that of the use of short-term temporary labour, a known area of higher risk for the waste sector.
- The actions to further mitigate the risks of modern slavery have included:
 - Creating awareness among our Benelux suppliers on our Modern Slavery Statement and expectations in this area;
 - Obtaining information from suppliers of temporary labour in order to assess the options to reducing suppliers of temporary labour to a shorter list of trusted suppliers;
 - Implementing a project to reduce the number suppliers of temporary labour in Benelux from over 100 to 11 key suppliers in the Netherlands and 3 key suppliers in Belgium;
 - Continued use of standard contracts and terms and conditions (which have been updated in the previous years) promoting modern slavery compliance in our supply chain and enabling carrying out supplier audits.
- Following on from the campaign held in 2021, Renewi again supported Anti-Slavery Day in the UK on October 18, to raise awareness among staff and the public. Internal messages were circulated, and posters displayed. Messages were also posted on our social media platforms, intended to both educate and signpost to help and support, while underlining Renewi's commitment to a Modern Slavery free environment.
- Renewi plc submitted its 2022 Modern Slavery Statement to the UK Government modern slavery statement registry.

Planned steps to be taken by Renewi in 2023/24

- Efforts will continue to further unify practices in the UK and Benelux, with the ambition of eventually having one Group-wide approach to Modern Slavery.
- The execution of the plan of actions regarding the risk related to the supply of short-term temporary labour (as set out above) will be continued, focussing on:
 - Designing awareness campaigns tailored for Benelux;
 - Facilitating closer relationships between our key suppliers of temporary labour in Benelux with dedicated Renewi account managers,
 - Investigation of the deployment on online tools and services to further develop transparency in our supply chains;
 - Identification and review of any requirements emanating from the Corporate Sustainability Reporting Directive (CSRD), developing any implementation plans as may be required
- There will be another Anti-Slavery awareness campaign held during Anti-Slavery week (16 – 22 October) and on Anti-Slavery Day itself (18 October 2023).
- In 2023/24 the Group intends to review its approach to Modern Slavery to ensure that our initiatives in this area remain robust and appropriate for the business.

3. Our business and supply chains

Renewi regularly uses agency labour procured through third party providers and sources materials and waste for our business through external businesses. The majority of our suppliers are UK or EU companies based in western Europe.

Having undertaken a risk assessment, we have concluded that the greatest Modern Slavery risks lie within our supply chains and that we would benefit from a higher degree of oversight in relation to our indirect suppliers and contractors, where the Modern Slavery risk is deemed higher. Renewi remains committed to identifying such potential risks and responds appropriately.

Our Group procurement team works closely with our suppliers and service providers. Where possible, we build long-standing relationships with these parties, making clear our expectation that suppliers and service providers take the same Anti-Slavery and Human Trafficking stance as Renewi and take reasonable steps to ensure the same is adhered to within their own supply chains.

All suppliers of labour, goods and services to Renewi must comply with 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. Where required by law, suppliers and Service Providers must produce an Annual Modern Slavery Statement pursuant to section 54(1) of the Modern Slavery Act 2015.

Renewi takes action to ensure that suppliers comply with Renewi's policies by screening significant suppliers on sustainability issues, including human rights and labour standards.

We intend to explore online tools to improve our control and monitoring of our supply chain as Renewi grows and evolves. Further control mechanisms in the yearly Supplier Audits are in place, carried out by external auditor(s), as part of our ISO certification. It has been contractually agreed with the key suppliers of temporary labour that they organize self-assessments to investigate potential issues, including risk of modern slavery, and to discuss the outcomes with Renewi in management review meetings.

During the year, we implemented a comprehensive HR System that will enable the integration of legacy personnel administration systems from across the Group. External workforce management was key requirement in the tender process for the system. The system selected has the capability to facilitate improved management of data on our temporary/ flexible workforce.

In 2018/19 Group payment and employment practices for our permanent employees were harmonised as part of the post-merger rationalisation. However, we recognise the risks highlighted in light of Operation Fort, the largest Modern Slavery and Human Trafficking case to go through the British courts, where victims were found working as short-term temporary staff for some of the UK's most well-known waste companies. Renewi operates a preferred supplier list for the provision of direct temporary labour, contract workers and the recruitment of new employees. We only work with recruitment agencies that share our stance against all forms of Modern Slavery. Any Health, Safety and Environmental breaches or incidents by or involving Service Providers or temporary staff is reported to the Board and appropriate action taken.

Should any indicators of Modern Slavery be identified, we would work with our suppliers to investigate and where appropriate, report to the necessary authorities. Should Renewi consider a supplier or Service Provider has failed to comply with any of the above, we will undertake review of the supplier or Service Providers contract, resulting in appropriate action being taken for any breach, up to immediate termination of the contract.

4. Our Staff

Ensuring the health, safety and wellbeing of our colleagues is crucial to Renewi's success and this responsibility is taken very seriously. Our people are crucial to our continued success. Their dedication and commitment to our 'waste no more' goal is one of the key reasons our customers choose to work with us. This is why the health, safety, wellbeing and engagement of our people is a top priority for Renewi. This starts with making sure our colleagues go home safely every day.

All colleagues must adhere to Renewi's Code of Conduct, and our Company policies including Bullying and Harassment, Disciplinary, Equal Opportunities and Grievance. Our Code of Conduct includes reference to laws such as the Modern Slavery Act 2015, setting out our expectations, and detailing how

suspected instances of Modern Slavery should be reported to our Integrity Team through the 24/7 confidential whistle-blowing hotline. Our policies are clearly defined and communicated. Our colleagues are treated fairly and equally and are paid at least the national minimum wage and Renewi complies with our obligations under the Working Time Regulations.

To raise awareness of Modern Slavery and trafficking and of our policies and procedures, an e-learning training model has been developed to train colleagues in the UK with responsibilities for people management and recruitment. In the future this will also include e-learning in the Benelux, as our approach towards Modern Slavery is further rolled-out into the rest of the Group. Further to this, every October, as part of Anti-Slavery Day, we hold an annual Group-wide awareness campaign to help our staff understand how to recognise and report instances of Modern Slavery. We also raise awareness of Renewi's zero tolerance approach to Modern Slavery through our Group Magazine and other communication platforms.

In 2019 Renewi established a Modern Slavery Working Group to help drive a more unified approach to Modern Slavery. The working group comprises representatives from HR, Legal and Procurement Departments from across the Group and helps drive Renewi's approach to Modern Slavery, and where required, makes recommendations to the Board over its Modern Slavery obligations. A primary focus for this group has been to promote awareness in the various countries in which we operate, recognising the varying levels of awareness around the risk of Modern Slavery within those countries. This will include training for our managers and communication campaigns to create awareness amongst employees.

All sites are overseen by competent management teams to ensure optimum control of the work environment.

5. Other

The following Companies within the Group, that are eligible to publish a statement under Section 54(1) of the Act, have adopted this Group statement:

- Renewi UK Services Limited.

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

Signed



Otto de Bont
Chief Executive Officer, Renewi plc
30 September 2023

Appendix 1 – Subsidiary undertakings as at 31 March 2023

Please see note 8.1 on page 238 of the Renewi plc Annual Report and Accounts 2023, downloadable from the link below, for a full list of the subsidiary undertakings:

<https://www.renewi.com/en/investors/investor-relations/reports-and-presentations>