



Renewi plc

Modern Slavery Statement 2019

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 2019 to prevent Modern Slavery and/ 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 re-enforce 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 legal entities under Renewi plc.

1. Our Organisation

Renewi is a leading waste-to-product business, with deep expertise and an extensive breadth of waste management products and services. We exclusively 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 four business divisions (Commercial, Hazardous Waste, Monostreams and Municipal), Renewi handles over 14 million tonnes of waste a year, of which 90% is either recycled or used for energy recovery and employs over 7,000 individuals in Europe and North America.

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.

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 in June 2019.

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

- The recruitment of a new head of procurement in the UK and the development of a larger procurement team to improve procurement procedures.
- An Anti-Slavery and Human Trafficking Policy has been created for UK employees.
- In the UK categorisation of suppliers has enabled certain supplier types to be treated as being at higher risk to Modern Slavery.
- In the UK all new suppliers have been issued with standard conditions of purchase, containing a requirement to adhere to statutory obligations and all Renewi policies. This includes adhering to the Modern Slavery Act.
- In the UK service agreements may include bespoke Modern Slavery clauses depending on the risks associated with that category of supplier.
- Approved the system and implementing partner for the Group-wide global 'Source to Pay' tool.
- The development of an e-learning platform to house training programmes and staff policies. The platform contains a specific Modern Slavery training module and holds the Modern Slavery and Human Trafficking Policy.
- In March 2019 a new group-wide Code of Conduct was issued, including a specific section about Modern Slavery and detail how any suspected instances should be reported.

Planned steps to be taken by Renewi

- In 2019 our approach to Modern Slavery will be further rolled out into the Benelux.
- From October 2019 the Group-wide global 'Source to Pay' tool will begin to be rolled out with full implementation by the end of 2020. This will include a Renewi Procurement Policy.
- In the UK in 2019, to further understand the risks of Modern Slavery, the procurement team will be issuing a survey to the supplier categories it considers to be of greater risk. The results of this survey will allow suppliers to be assessed on an individual basis as to the risks of Modern Slavery within their supply chains. The data generated from this risk assessment will shape the approaches to Modern Slavery in the future.
- In the UK in 2019 there will be an awareness campaign directed towards suppliers providing them with information about Modern Slavery making them aware of their obligations in terms of Modern Slavery.
- In 2019 the newly developed Modern Slavery e-learning training module will be rolled out to staff who are most at risk of encountering Modern Slavery.

3. Our business and supply chains

The Board acknowledges that the increased size of the Company following the merger of Shanks Group plc ("Shanks") and Van Gansewinkel Groep B.V. ("VGG") in February 2017, has increased the exposure of Renewi to the risks of Modern Slavery. Over 2018/19 there has been a rationalisation of the group structure, helping us understand and refine the structure, and helping reduce the risk of Modern Slavery within Renewi.

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.

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, and this will be an area of focus for us in the coming year.

Our UK and Benelux divisional procurement teams work closely with all of 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 are currently in the process of implementing a Group-wide global 'Source to Pay' tool which will improve our control and monitoring of our supply chain as Renewi grows and evolves. In February 2019 we approved the system and implementing partner for the tool, and there will be a phased introduction of the tool expected to start in October 2019 and finish by the end of 2020. There is a further control mechanism in the yearly Supplier Audits, carried out by external auditors, as part of our ISO certification.

In our own operations, the majority of our colleagues are employed on permanent contracts. In 2018/19 group payment and employment practices have been harmonised as part of the post-merger rationalisation. However, we recognise that there is a potential risk of Modern Slavery for workers not in permanent employment, particularly the provision of temporary labour through recruitment agencies or managed service contracts. 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 an automatic review of the supplier or Service Providers contract, resulting in appropriate action being taken for any breach, up to immediate termination of the contract.

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 with responsibilities for people management and recruitment in this area. Further to this, in 2019 an awareness campaign will be directed towards suppliers providing them with information about Modern Slavery and making them aware of their obligations.

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. Furthermore, in addition to this Modern Slavery Statement and underlying policy, we have an Anti-slavery and Human Trafficking statement in place. 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.

In the course of 2018/19, Renewi's Code of Conduct has been re-written to harmonise Legacy Shanks and VGG policies. Our new Code of Conduct includes reference to laws such as the Modern Slavery Act 2015, setting out our expectations, and detailing how suspected instances should be reported. Part of the new Code of Conduct includes a new Investigation Protocol to allow 24/7 confidential reporting and whistle-blowing. As part of the internal communications around the new Code of Conduct, we will raise awareness of Renewi's zero tolerance approach to Modern Slavery through our Group Magazine and other communication platforms.

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

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

28 June 2019