

Modern slavery statement

May 2025

Introduction

This statement sets out the measures SUEZ recycling and recovery UK has in place, the actions we have taken during 2024 and demonstrates continuous improvement in managing the risk within our business and supply chains.

We recognise that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a world-wide and growing issue. The waste management and recycling sector has been specifically targeted by perpetrators of this type of crime. As a leading waste management and recycling business in the UK, the company recognises the need to adopt a robust approach to slavery and/or human trafficking and commits to identifying areas of risk within our business, and to develop strategies and approaches to mitigate those risks proactively.

Having originally joined Slave-Free Alliance in September 2019, they conducted a gap analysis which SUEZ recycling and recovery UK used as the basis for improvement over the past four years. In January 2023, we commissioned Slave-Free Alliance to conduct a benchmarking activity to aid us with our continuous improvement in efforts (both internally and externally) to address and reduce the risks for modern slavery and broader human rights violations.

Organisational structure and supply chains

SUEZ operates at over 280 sites across the UK with more than 7,000 people delivering our recycling and recovery services. 2% of our workforce are agency staff. Our business headquarters are in Maidenhead, UK. The following companies are covered by this statement:

SUEZ Recycling and Recovery UK Ltd
SUEZ Recycling and Recovery South East Ltd
SUEZ Recycling and Recovery Lancashire Ltd
SUEZ Recycling and Recovery Surrey Ltd
SUEZ Recycling and Recovery Kirklees Ltd

We currently spend over £819 million per year across 3,200+ suppliers. Of this, over 95% is spent with UK-based companies.

Our supply chains are integral to delivering efficient and sustainable recycling and recovery services. We work closely with our suppliers to ensure they align with our values and standards, fostering partnerships that contribute to innovation, operational excellence and ethical practices across our business.

Policies in relation to slavery and human trafficking

SUEZ has in place the following policies and procedures that set out 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 – reviewed annually.
- ⇒ Whistleblowing Policy – This includes modern slavery and human rights issues in the list of types of occurrences that can be reported through the whistleblowing process.
- ⇒ SUEZ uses an independently provided whistleblowing hotline, which provides an easy and confidential means for concerns to be raised. This is provided so that employees who feel they are not able to raise concerns internally have a method to do so in confidence. We investigate every whistleblowing case thoroughly and seek to achieve a resolution as soon as practicable.
- ⇒ Diversity Policy.
- ⇒ Recruitment Appointment Guidelines.

- ⇒ WeCare – Our Employee Assistance Programme provides an external and confidential support and advisory service on a range of issues. Advice can be provided by telephone, video call or face-to-face counselling.
- ⇒ Wellness Charter – Our culture promotes and actively supports the wellness of all of us, every day. It includes our commitment to diversity and inclusion in line with our value of respect.
- ⇒ Supplier Code of Conduct – 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.
- ⇒ Sustainable Procurement Policy – Strives to gain supply chain transparency and source products, materials and services using credible and recognised sourcing and certification schemes, where available. It also aims to help us identify and address human rights abuses and labour exploitation in our supply chain.

Due diligence processes with our supply chain

SUEZ works with over 3,200 suppliers. Our procurement team have been trained to identify potential risks in our supply chain and have introduced the necessary controls to mitigate the risk.

Our Supplier Code of Conduct, which all suppliers sign up to when being onboarded, includes a commitment for suppliers to adhere to all laws and regulations prohibiting human trafficking and forced or indentured labour, such as the Modern Slavery Act 2015. This includes the preparation and publishing of an annual statement where their turnover exceeds UK legislative thresholds. We expect suppliers to implement policies, practices, and due diligence checks to ensure that modern slavery, child labour and human trafficking are not taking place in their supply chain, or in any part of their business. As such, suppliers must:

- ⇒ Comply with all applicable laws, codes, and regulations wherever they operate;
- ⇒ Promptly notify SUEZ of any significant criminal or civil legal actions brought against them; and
- ⇒ Promptly notify SUEZ of any fines or administrative sanctions brought against them which relate in any way to the requirements set out in the Supplier Code of Conduct.

We also include our anti-slavery policy in our onboarding information for all new suppliers to make them aware that there is no ambiguity in the SUEZ position with regards to modern slavery.

To ensure compliance with our Supplier Code of Conduct and Sustainable Procurement Policy, we actively monitor and engage with our supply chain. This includes conducting regular audits, collaborating with suppliers to promote best practices and implementing reporting mechanisms to identify and address any issues. By maintaining transparency and fostering strong partnerships, we strive to uphold ethical standards and mitigate risks of labour exploitation or human rights abuses within our supply chain.

To strengthen ethical supply chain practices, SUEZ actively collaborates with suppliers through ongoing engagement, knowledge-sharing and support. This includes regular discussions in Supplier Relationship Management meetings, where suppliers are encouraged to adopt best practices and address any identified risks.

The frequency of audits and Supplier Relationship Management meetings is determined based on the contract type, risk value and supplier performance levels. Suppliers are assessed individually, with higher-risk contracts or poorly performing suppliers undergoing more frequent audits and reviews. Similarly, newly onboarded contracts may require closer monitoring during the initial phases to ensure compliance and service quality. In addition, we continuously adapt our engagement strategy based on the service levels received – for example, suppliers who underperform or those with new contracts may have more frequent reviews to address challenges proactively.

This robust dynamic approach not only ensures continuous monitoring and improvement but also facilitates supplier development by identifying opportunities for enhanced transparency and responsible sourcing.

We have risk assessed our supply chain at a high level and identified that our Agency suppliers and Managed Service providers are an area where there is a potential risk. As such we include labour provider audits as a standard agenda item in Supplier Relationship Management meetings with these suppliers. Both our suppliers for Agency Labour and Managed Services are members of the Slave-Free Alliance with Smart Solutions also being registered with the Gangmasters and Labour Abuse Authority (GLAA), Stronger Together and the Association of Labour Providers (ALP) and are pro-actively undertaking additional checks to ensure that no SUEZ recruits are being exploited by outside influences. For example, during our audit checks with our main labour suppliers, Magnit Global and Smart Solutions both perform numerous checks to ensure the resource being provided has been vetted and checked for risk of modern slavery. These checks include but are not limited to, checking there is no duplication of essential information, that charges are not being levied to the staff for PPE, recruitment fees or transport costs and that the registration process is undertaken correctly including right to work documents checked.

We have a vendor neutral agency staff supplier which is engaged by SUEZ to provide a managed service delivering temporary labour services to our sites. They undertake regular modern slavery audits with the panel of agencies who supply SUEZ. This is to effectively manage the risk to the organisation and ensure that no person employed by SUEZ under these services are being exploited. These audits investigate if each agency has in place all the various checks that may bring to light instances of modern slavery – for example, duplicate address checks, duplicate next of kin checks, duplicate bank accounts. They also ensure that each agency has a modern slavery policy, a whistleblowing policy and a fair recruitment policy amongst others. These audits are shared with SUEZ on a quarterly basis, with any issues raised and discussed, including any actions, outcomes, or concerns as well as positive areas of best practice. Where the agency audit highlights actions required from a panel member and the agency don't remedy the situation within the given timescale, that agency is removed from the panel and no longer used by our supplier or SUEZ.

We have improved our modern slavery questionnaires and assessment processes that are used when onboarding suppliers and in tenders as well as in Supplier Relationship Management meetings.

Identification of risk and steps taken to prevent and manage risk

We have identified five classification areas that we believe are high risk within the UK. This classification has been done in conjunction with Slave-Free Alliance and focuses on sectors where vulnerable groups to modern slavery have been identified:

- ⇒ Agency Labour
- ⇒ Construction
- ⇒ Facilities Management
- ⇒ Industrial Services
- ⇒ Disposal

We renewed our membership with Slave-Free Alliance at the end of 2022, for another three years, demonstrating our continued commitment to managing the risk and taking steps to prevent modern slavery. Being a member of Slave-Free Alliance provides us with access to expertise and advice on best practice.

Our Optimisation Committee (Executive Team) receives updates twice a year on the work and progress of the modern slavery working party. These updates include seeking approval of actions and answering questions on the activities of the working party. The working party meets on a regular basis to identify and address risks, working closely with Slave-Free Alliance.

Effectiveness in ensuring slavery is not taking place – performance indicators

Whilst we continue to check on duplicate addresses, bank details, next of kin and phone numbers, we have not identified any red flags.

Training and building capacity

All new graded employees attend a full week's induction which includes protected time for them to complete the online learning about modern slavery – including a test to ensure they have completed and learnt from the experience. Managers of frontline employees receive training on how to effectively deliver a modern slavery toolbox talk. The toolbox talk contains the relevant learning for all our frontline employees.

Collaboration and partnerships

We recognise that no organisation can tackle the issue of modern slavery alone. We have sought to collaborate with others, share our own experiences and welcome learning best practice from others.

Slave-Free Alliance

We work closely with Slave-Free Alliance to address any risks and areas of improvement identified in the continuous improvement audit. We have created a joint action plan with clear priorities with Slave-Free Alliance which is reviewed regularly.

Supply Chain Sustainability School

We are a partner of the Supply Chain Sustainability School, an invaluable source of innovative learning content for anybody who works, or aspires to work, in the built environment industry. This content includes modern slavery resource and enables us to improve the training of our own employees. In addition, by joining the modern slavery leadership group for the school, we engage with other companies to share best practice on modern slavery and can input to future modern slavery resources. We are also able to direct our own suppliers in high-risk areas to access the free training on modern slavery provided by the school, a particular help to small and medium-sized suppliers that may not have their own resources.

In 2023, we held a modern slavery workshop led by the Supply Chain Sustainability School for our procurement team. We have also joined the Modern Slavery Leadership Group to share best practice with other partners and help guide the direction of the school.

Waste & Recycling Modern Slavery Working Group

SUEZ was a founding member of this collaborative group across the sector. The Waste & Recycling Modern Slavery Working Group has 18 member businesses which span contracting, management, logistics, exporting of waste, textiles, paper, plastic, e-waste, metals and more. It raises awareness of modern slavery and develops solutions for mitigating the risks that the whole sector faces.

Key achievements in 2024/2025

- ⇒ Extended the circulation of our **Preventing Modern Slavery in the Supply Chain: A Guide for Suppliers** document to all new suppliers, incorporated into our supplier onboarding process and made publicly available on our website for existing suppliers and stakeholders.
- ⇒ Reviewed recently acquired businesses to ensure they have correct processes in place to identify and tackle modern slavery and human rights abuses and are aligned to those of SUEZ.
- ⇒ Reviewed the acquisition process to ensure sufficient due diligence is taking place to identify modern slavery and other people-related risks.
- ⇒ Identified key individuals required to deliver the escalation process and arranged appropriate levels of training.
- ⇒ Uploaded all of our policies and procedures to our intranet, so they are easily accessible to employees via this channel.

Looking ahead to 2025/26

Our supply chain targets for 2025/26 are:

- ⇒ To continue to improve the rigour of the modern slavery assessments in the onboarding process.
- ⇒ We have classified the high-risk categories of spend which are:
 - Agency Labour
 - Construction
 - Facilities Management
 - Industrial Services
 - Disposal

We have worked with Slave-Free Alliance to identify appropriate mitigations for the suppliers within these categories in order to reduce the risk. We are implementing these mitigations and are continuing to issue questionnaires to high-risk suppliers in 2025/26. We will assess the results to identify any suppliers that are not meeting our standards and work with these suppliers to improve their performance or remove them from our supply chain.

- ⇒ We are introducing specific contractual clauses for our high-risk suppliers which will be included in new contracts.

Other areas of development

- ⇒ Determine the levels and areas of training provided to indirect employees, such as agency workers, when their agencies onboard them.
- ⇒ In high risk areas, such as materials recycling facilities, specially targeted training for all employees.
- ⇒ Develop a training session for Driver Certificate of Professional Competence.
- ⇒ Present the working parties plans to the SUEZ Works Council.
- ⇒ Further communicate our reporting mechanism – including the refreshed flow chart of our escalation process with a Single Point of Contact – along with supporting guidance documentation, by end of 2025
- ⇒ Invite members of the construction and facilities team to join the working party to support with addressing salient risks.

This statement has been approved by the board of SUEZ recycling and recovery UK on 11 June 2025 who will review and update it annually.



John Scanlon
Chief Executive Officer, SUEZ recycling and recovery UK