



## **Modern-Slavery and Human Trafficking**

### **Introduction**

Lakeside EfW Ltd is fully committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing systems and controls to ensure modern slavery and human trafficking is not taking place anywhere within our own business or in any of our supply chain.

We have no tolerance to slavery or human trafficking. We expect all of those in our supply chain and contractors to comply with our values. Where possible we prefer to build long standing relationships with our suppliers and we make clear our expectations of business behaviour.

### **Organisation Structure**

Lakeside Energy from Waste Ltd, is a Joint Venture Company formed by two of the UK's most progressive companies: Grondon Waste Management and Viridor Waste Management.

### **Our Business**

Lakeside Energy from Waste operates and maintains a plant that processes waste, generates electricity for export and recovers by-products, where practicable. The site includes an Education Centre for the local community as part of our commitment to raising awareness of our activities.

All waste, which is used as fuel, is sourced within the United Kingdom. Raw materials used in the process are UK sourced where possible, with a limited number of raw materials shipped from abroad. Parts for the plant are mainly sourced from the UK and European union.

### **Our Supply Chains**

Lakeside EfW operate strict procurement processes, ensuring suppliers adhere to clearly defined policies of sustainability and ethical working practices. We expect all our entities to have suitable anti-slavery and human trafficking policies and processes within their businesses and to cascade those policies to their suppliers.

### **Our Policies on Slavery and Human Trafficking**

Prior to appointing contracts we assess areas of potential risk within our supply chains. We include appropriate terms in our contractual documentation and standard terms and conditions which require third party contractors to comply with the Modern Slavery Act 2015.

Throughout the life cycle of our contracts, we reserve the right to conduct audits on our supplier contracts. Through our training programmes and monitoring of suppliers, staff are encouraged to identify and report any potential breaches of Lakeside's anti-slavery and human trafficking policy. Within our business, we use agency labour which is procured through key third party providers. The providers are responsible for vetting all agency staff and ensuring that they adhere to all legal requirements to protect works from poor treatment and exploitation.

We will assess any instances of non-compliance on a case-by-case basis and tailor any remedial action appropriately. We will only trade with those who fully comply with this statement or those who are taking verifiable steps towards compliance.

### **Training**

Our managers and those with a responsibility for procurement, have been trained in modern slavery, to ensure that they understand and have an awareness of the basic principles of the modern slavery act and are equipped to spot signs of potential slavery and human trafficking.



### **Supplier adherence to our values and ethics**

We are committed to raising the bar to combat 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 and are working closely with providers to verify their existing processes and to develop our own monitoring program.

We expect that all our suppliers and contractors comply with equivalent principles set out in this statement.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Lakeside EfW Ltd. anti-slavery and human trafficking statement for the financial year 2024/25.

The statement was approved by the Lakeside Board.

A handwritten signature in blue ink that reads "D Coulston".

D Coulston  
Operations Director  
Lakeside EfW Ltd

Effective 3/10/24