kenny waste management

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KENNY WASTE MANAGEMENT HAVE A ZERO TOLERANCE TO MODERN SLAVERY

Kenny Waste Management have a **zero tolerance** to Modern Slavery and this statement, made on behalf of the board, sets out its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. It has been prepared and set out in accordance with the requirements outlined in section 54 of the Modern Slavery Act 2015.

INTRODUCTION

Kenny Waste Management recognise the harmful impact slavery, servitude, forced labour and human trafficking (Modern Day Slavery) has on individuals, communities, and society. We understand the waste management sector has been targeted by organised criminal gangs to supply hidden exploited labour and we are determined to prevent this occurring within our business. Hidden labour exploitation is the exploitation of job applicants and workers by third party individuals or gangs other than the employer or labour provider. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

In 2022 we partnered with Slave-Free Alliance who have carried out an audit and gap analysis of our approach to ensuring modern slavery does not exist within our business and, as far as we can control, our supply chain. We have continued to work with them in 2023 and 2024 to ensure our policies and practices reflect up to date best practice.

CONTENTS

p.1. ..... INTRODUCTION
p.2. ..... 1. ORGANISATION STRUCTURE AND SUPPLY CHAINS
p.2. ..... 2. POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING
p.3. ..... 3. DUE DILIGENCE PROCESS
p.3. ..... 4. RISK ASSESSMENT AND MANAGEMENT
p.4. ..... 5. KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN
p.4. ..... 6. TRAINING ON MODERN SLAVERY AND TRAFFICKING
p.5. ..... FUTURE FOCUS
p.6. ..... STATEMENT RESPONSIBILITIES

1. ORGANISATION STRUCTURE AND SUPPLY CHAINS

We operate a UK wide waste recycling service which comprises of 'waste partners'. The waste industry typically uses migrant workers and with this we recognise there may be increased risks. We process over two hundred thousand tonnes of waste a year and proudly divert over 99% of the waste we receive from landfill. Our business relies on over 300 supply chain partners to help deliver our services and we are proud that 100% of these are UK based companies.

We operate three sites across Greater Manchester, currently employ 200 people, and have a reported turnover at our last financial year end of over forty million pounds. We have three businesses within our group, and the following companies are covered by this statement:

- **Kenny Services Limited**
- **Kenny Waste Management Limited**
- **Kenny Waste Management Social Enterprise Limited**

2. POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Kenny Waste Management operates the following policies which are instrumental in helping us identify and prevent slavery and human trafficking in our operations:

- Whistle Blowing
- Recruitment
- Procurement
- Anti-Slavery and Human Trafficking

Our Anti-Slavery and Human Trafficking policy explains what modern slavery is, Kenny Waste Management's stance towards it, its reach, and its expectations on stakeholders. It also provides a reporting mechanism for any concerns or conflicts with the policy.

We have updated these policies and will continue to review our practices regarding modern day slavery.

3. DUE DILIGENCE PROCESS

All waste partners have completed a questionnaire and where relevant have shared their Modern Slavery Policy and Statement.

All suppliers are also provided with our Supplier Code of Conduct. This comprehensive document outlines the standards which suppliers must comply with when trading with Kenny Waste Management and includes:

> environmental protection
> community investment
> operating ethically
> creating a safe and healthy workplace

Requirements around modern slavery and human rights violations are included in the latter two sections of the Code of Conduct and correlate with standards set internationally. The document also outlines the potential sanctions for non-compliance and the fact that announced or unannounced visits may be carried out to ensure Kenny Waste Management's requirements are being met.

4. RISK ASSESSMENT AND MANAGEMENT

Kenny Waste Management's supply chain is relatively concise and managed through a variety of roles and responsibilities. A large proportion of our supply chain sits in the waste partner business area, who carry out outsourced work on behalf of Kenny Waste Management nationally. This provision has grown exponentially over recent years and is an area of the supply chain where we are aware there are clear risks of modern slavery.

Other areas of risk include our outsourced labour provision. As such we have significantly reduced our list of agency providers over recent years from 14 to just 3, all of whom are long-term suppliers. At the present time only 12 (6%) of our staff are employed via these agencies.

Other risk areas for modern slavery such as maintenance, cleaning and clothing/PPE have either been brought in or are managed in-house.

5. KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

We will know if the measures we are taking are effective if:

- There are no reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Members of the HR, Supply Chain, or Sales team identify no signs of slavery or trafficking during site audits and 'Waste Partner' selection.

Through our partnership with Slave-Free Alliance we are working to develop further key performance indicators in 2024/25. This will involve creating simple, achievable, time-bound performance targets (KPIs) to maintain and monitor continuous improvement and will include targets for policy review, training, supplier performance review, and reporting.

6. TRAINING ON MODERN SLAVERY AND TRAFFICKING

We have worked with Slave-Free Alliance to create a detailed Escalation Procedure to give structure and information for responding to potential incidents of modern slavery.

A key finding of the gap analysis carried out by Slave-Free Alliance was the need to undertake a training needs analysis across the workforce to highlight the appropriate levels of training required according to roles, tailored to different areas of the organisation, which we have now completed.

To embed this, we have been working with Slave-Free Alliance to develop a three-pronged staff training programme which includes trainer-led sessions for nominated reporting staff, online training for office & remote staff, and toolbox talk training for site-based operational staff. These will provide our employees with training on the issue, how to recognise the signs of someone trapped in a forced or hidden labour scenario and their responsibilities in embedding best practice across our business. This will be rolled out during the remainder of 2024.

To assist in developing our knowledge in this area we continue to be a member of The Waste & Recycling Modern Slavery working group. This is a cross-sector network of over 20 organisations, chaired by the Slave Free Alliance. This group looks to identify and assess labour rights issues, and develop shared resources to address human rights issues in an open and non -competitive manner, that are directly relevant to the sector we operate in.

A director of Kenny Waste Management Social Enterprise has also joined the Trustee board of a charity supporting survivors of Modern Slavery and Human Trafficking.

FUTURE FOCUS

Kenny Waste Management will continue to improve the steps we take to address Modern Slavery in line with sector best practice. As a responsible business, we will remain alert to the risks and will enhance all measures accordingly. Our focus will be on engaging our employees and continuing to collaborate with supply chain partners to raise awareness and support them to adopt new policies and procedures.

In line with the recommendations from the gap analysis carried out by Slave-Free Alliance in 2022, in 2024/5 we will:

- Review and develop our supplier and pre-qualification questionnaires, the Service Level Agreement and any other contractual agreements that place demands on supplier commitment to social agendas such as modern slavery.
- Develop processes to test the responses of suppliers to questionnaires and other contractual agreements in line with the level of risk.
- Create a risk mapping process, which places suppliers in tiers according to the level of risk.

STATEMENT RESPONSIBILITIES

Kenny Waste Management's Modern Slavery and Trafficking Statement.is made pursuant to section 54 of the Modern Slavery Act 2015.

It has been approved by the board of Kenny Waste Management, who shall take responsibility for this statement and its commitments, and this statement will be reviewed and updated annually.



Neil Mackey

Managing Director
Kenny Waste Management
July 2024