

2024

MODERN SLAVERY STATEMENT

Bywaters
recycling made easy



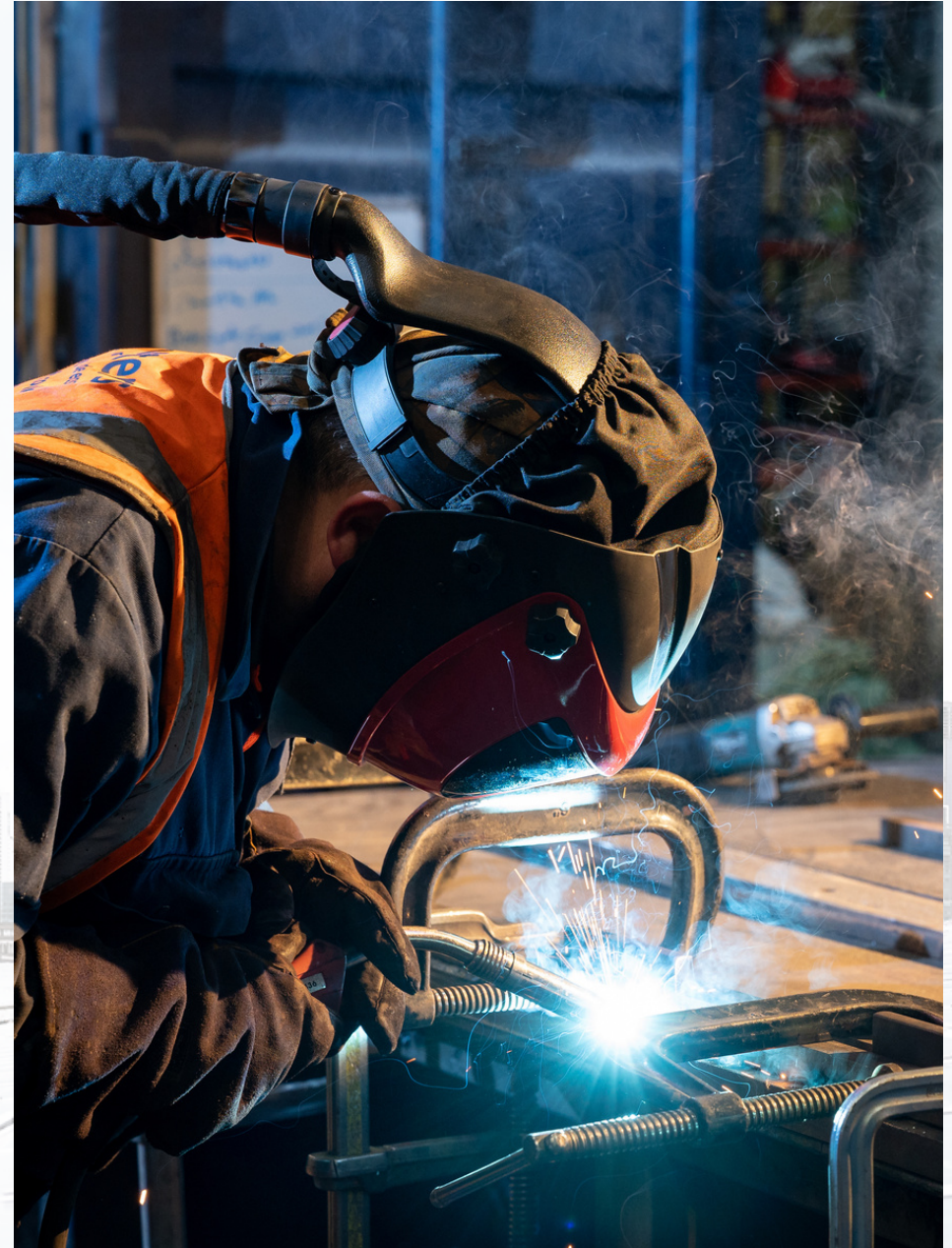
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An Introduction...

This statement is presented in accordance with the Modern Slavery Act 2015 and serves as the slavery and human trafficking declaration for Bywaters (Leyton) Limited for the financial year ending on March 31, 2024.

This statement outlines the actions taken by Bywaters to identify, address, and prevent modern slavery and human trafficking within our operations and supply chain.



Bywaters' Structure, Business, and Supply Chains

Bywaters is London's leading recycling and waste management organisation, serving London and the Southeast since 1952. We offer a comprehensive range of customised recycling and waste management services, providing businesses with a 'zero direct to landfill' solution.

We maintain a strict zero-tolerance policy towards modern slavery. Through the measures outlined in this statement, we believe we have a low risk of modern slavery within our organisation and supply chain.

Our policies and procedures related to modern slavery are fully endorsed by our Board of directors and senior management team. Bywaters is committed to upholding the Modern Slavery Act 2015, promoting ethical principles and practices to combat modern slavery and human trafficking.

We expect our supply chain partners to share this commitment and will not engage with suppliers known to be involved in slavery or human trafficking. We continuously seek to enhance our knowledge of best practices, participating in events and actively contributing to the Waste and Recycling Modern Slavery Working Group, chaired by the Slave-Free Alliance.



Bywaters' Relevant Policies and Procedures

At the core of Bywaters' values is the belief that every individual should be treated with dignity and respect. We consider it essential to maintain a slave-free environment, which includes providing fair working conditions and ensuring salaries meet minimum and national minimum wage for both temporary and permanent workers.

Our induction process aligns with the Home Office's Right to Work guidelines, ensuring fair recruitment practices for all prospective employees.



We require all employees to uphold a respectful work atmosphere, free from abusive or unprofessional behaviour. Our policies and procedures for minimising the risk of modern slavery are reviewed annually and include:

- **Whistleblowing:** All staff have access to our whistleblowing policy through our in-house HR system, with policies posted on notice boards in operational areas. In addition, a confidential online form has been implemented which gives all employees a secure platform for them to report any concerns.
- **Equal Opportunities:** Ensuring fairness and transparency in treatment regardless of race, religion, gender, age, marriage or civil partnership, pregnancy/maternity, sexual orientation, gender reassignment, or disability.
- **Health and Safety in the Workplace:** Promoting a safe and healthy work environment by implementing measures to identify signs of exploitation, protect vulnerable workers, and ensure compliance with legal standards. This includes empowering workers to report abuse, conducting regular audits focused on health and safety as well as working conditions, and supporting overall well-being and human rights.
- **Recruitment Policy and Procedure:** Partnering with pre-approved recruitment agencies and regularly assessing

their compliance with our standards. We ensure that all employees receive their salaries directly into their own bank accounts, safeguarding their financial autonomy, preventing wage withholding, and promoting transparency and accountability.

- **Employee Assistance Programme and Employee Well-being:** As part of our commitment to safeguarding employee well-being and preventing modern slavery, we offer a comprehensive Employee Assistance Programme (EAP) designed to support employees facing work-related or personal challenges. This confidential service provides access to professional guidance, ensuring that all employees have a safe space to discuss concerns, including those related to exploitation, abuse, or coercion. Through the EAP, we aim to protect vulnerable workers and reinforce our commitment to upholding human rights and ethical labour practices across the organisation.
- **Supply Chain and Procurement Process:** We take a proactive approach to ensuring that our supply chain and procurement processes are free from modern slavery and human trafficking. Our dedication to ethical sourcing is embedded in every aspect of our supply chain management, with rigorous measures in place to detect, prevent, and address any risks of exploitation.

- **Modern Slavery Response Policy:** Escalation and Remediation implemented during 2023. The policy outlines the escalation and remediation process to be followed when a case of modern slavery is identified within our organisation, supply chain, or any other operational aspect. The aim is to ensure that all cases of modern slavery are handled with urgency, sensitivity, and in accordance with legal and ethical standards. This policy is in line with our commitment to uphold human rights and eradicate all forms of modern slavery.
- **Employee Code of Conduct:** Defining expectations for employee behaviour and ethical standards in interactions with colleagues and external parties throughout the performance of their duties.



Due Diligence

Our internal modern slavery working group, consisting of managers from various departments, meets regularly to assess our processes related to modern slavery and review progress against our statement and plans. This group focuses on supply chain and labour through recruitment agencies, areas of particular concern.

During onboarding, we ensure all new employees provide appropriate documentation, with special attention to duplicate addresses and bank details. New starters also receive modern slavery awareness training as part of their induction process.



In addition, our due diligence and review processes include:

- Procurement personnel working towards Chartered Institute of Procurement and Supply (CIPS) accreditation, ensuring ethical procurement practices.
- Mapping the supply chain to assess product or geographical risks.
- Classifying suppliers into high, medium, and low-risk categories.
- Evaluating modern slavery and human trafficking risks for new suppliers.
- Conducting supplier audits.
- Supplier assessments prior to initiation of onboarding of all new goods and service providers.
- Participating in initiatives focused on human rights, slavery, and human trafficking.
- Enforcing sanctions against non-compliant suppliers.
- Using indicative pricing statistics when reviewing quotations.
- Providing a Modern Slavery Toolbox talk to all staff members.
- Continuous improvement and supplier development.

Risk Assessment

Bywaters conducts quarterly risk assessments related to modern slavery and human trafficking. These assessments, led by our in-house SHEQ Team, focus on our supply chain and high-risk areas.

Our policies and procedures are enhanced and reviewed annually, including those related to Human Resources and Recruitment, to increase our capability to detect any cases of modern slavery and compliance with relevant laws for the protection of human rights.



Measuring Effectiveness

Following our annual risk assessments, we conduct comprehensive audits with all suppliers to ensure full compliance with our modern slavery policies and ethical standards. These audits thoroughly assess labour practices, working conditions, and adherence to legal and ethical obligations related to human rights. The results are meticulously reviewed and reported to the board of directors, ensuring transparency and accountability at the highest levels of the organisation.

In addition, our established clear and measurable key performance indicators (KPIs) across all departments monitor critical areas related to modern slavery prevention. These KPIs track the effectiveness of employee training, awareness initiatives, and internal communication channels for escalating concerns. Regular reporting on these indicators allows us to assess the progress of our efforts, ensuring swift and effective action in identifying and addressing any risks of modern slavery within our supply chain or operations.

By integrating these measures, we remain committed to fostering a culture of vigilance, ethical behaviour, and

continuous improvement in the fight against modern slavery.



Raising Awareness

Managers are required to complete mandatory modern slavery training through our dedicated e-learning module, which provides them with the knowledge and tools to identify, prevent, and address modern slavery risks within their teams and operations. This training covers essential aspects, such as recognising signs of exploitation, understanding the legal framework, and knowing the appropriate steps to take when concerns arise. By ensuring that all managers are thoroughly trained, we promote a culture of awareness and accountability at every level of leadership. Additionally, we conduct Modern Slavery Toolbox talks for operational staff and hold an annual awareness campaign to further highlight the importance of preventing modern slavery across the organisation.

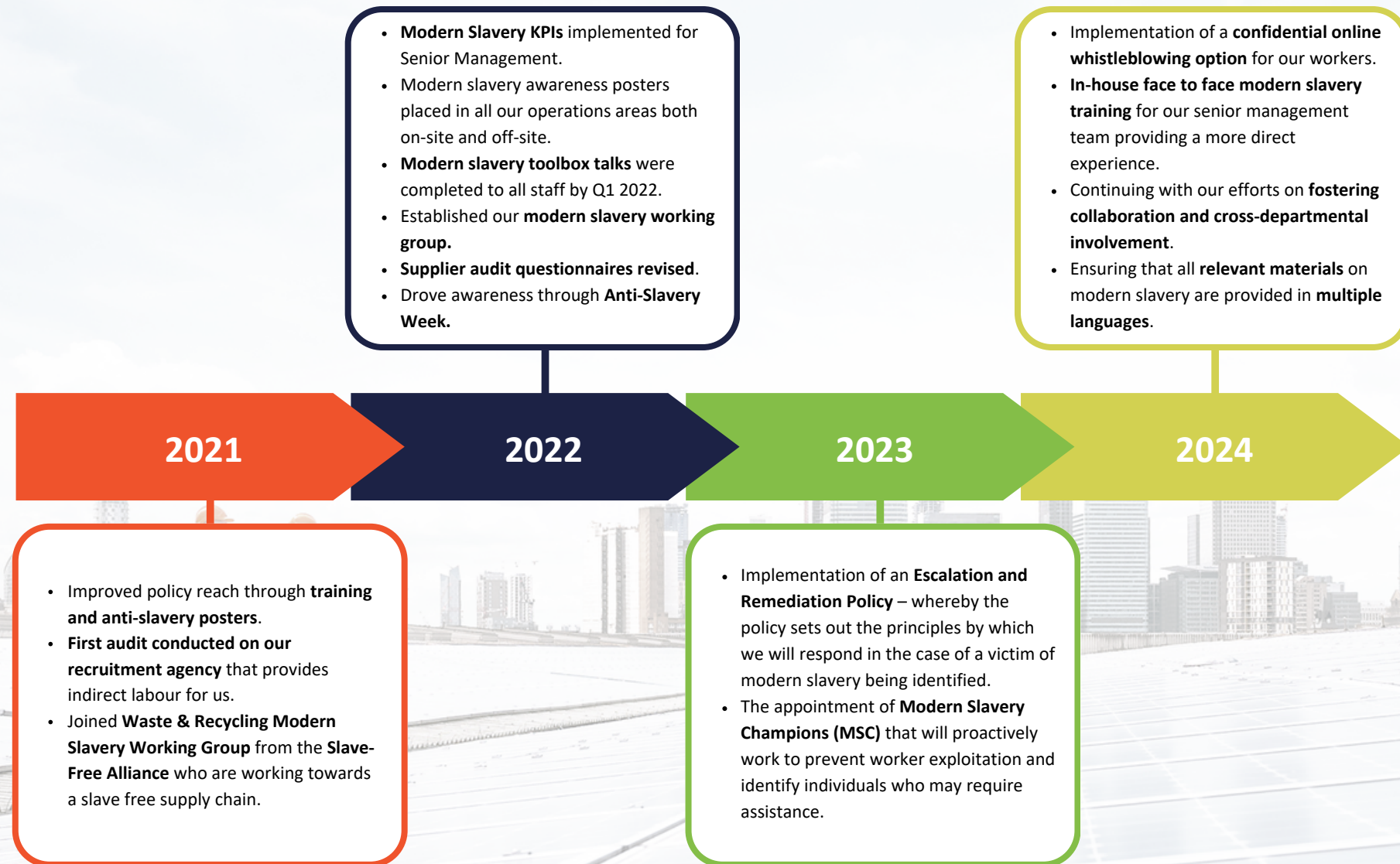
In addition to internal training, we extend this resource to our suppliers, who can access the e-learning module upon request or if they are identified as falling below our standards in our risk assessments or audits. This ensures that our ethical standards are consistently reinforced across the supply chain, promoting awareness and accountability beyond our own organisation.

Our training covers:

- Ethical purchasing practices.
- Assessing the risk of slavery and human trafficking.
- Identifying signs of slavery and human trafficking.
- Initial steps when suspicion arises.
- Escalating potential issues.
- Messages, incentives, and guidance for suppliers to implement anti-slavery policies.
- Steps to take if suppliers do not comply in high-risk scenarios.



Our Progress So Far...





Signed: Anne Sanni

Name: Anne Sanni

Position in company:

Associate Director; Human Resources

Date: September 2024