

Modern Slavery Statement

2026- 2027



Modern Slavery Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Bywaters (Leyton) Limited during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking within our operations and supply chain.

At Bywaters, we are committed to conducting business ethically, responsibly, and with integrity. We recognise our responsibility to respect and protect human rights and maintain a zero-tolerance approach to all forms of modern slavery, forced labour, human trafficking, servitude, and exploitation. We expect the same high standards from everyone who works for us and with us, including suppliers, contractors, labour providers, recruitment agencies, and other business partners.

Our Business and Supply Chain

Bywaters is London's leading recycling and waste management organisation, serving businesses across London and the South East since 1952. We provide comprehensive recycling and waste management services and operate a zero direct-to-landfill solution. The majority of our approximately 240 employees work from our Lea Riverside Head Office and our Leyton operational site.

While we consider the risk of modern slavery within our direct workforce to be low, we recognise that risks may exist within wider supply chains, labour provision, subcontracted services, and industries that support our operations. As a result, we continue to strengthen our controls, governance, and due diligence activities to identify, prevent, and address any potential risks.

Governance and Commitment

Our Board of Directors and Senior Management Team fully support and endorse our commitment to preventing modern slavery. We actively contribute to industry-wide initiatives, including participation in the Waste and Recycling Modern Slavery Working Group and our commitment to the Waste and Recycling Modern Slavery Protocol developed by IPHR. These collaborations support stronger governance, greater transparency, knowledge sharing, and continuous improvement across our sector.

Modern slavery prevention remains a standing business priority and forms part of our wider Environmental, Social and Governance (ESG) responsibilities. Through proactive engagement with industry groups, suppliers, and employees, we seek to promote ethical labour practices and raise standards throughout our supply chain.



Bywaters' Policies and Procedures

We maintain a comprehensive framework of policies and procedures designed to minimise the risk of modern slavery and human trafficking. These are reviewed annually and include:

- Whistleblowing Policy, including a confidential online reporting channel.
- Equal Opportunities Policy.
- Health and Safety Policy.
- Recruitment Policy and Procedure.
- Employee Assistance Programme (EAP).
- Supply Chain and Procurement Procedures.
- Modern Slavery Response Policy.
- Employee Code of Conduct.

These policies support fair treatment, ethical recruitment, worker welfare, responsible procurement practices, and clear reporting mechanisms for concerns relating to exploitation or unethical conduct.

Modern Slavery Working Group

Our Modern Slavery Working Group brings together representatives from Compliance, Human Resources, Procurement, and Operations to provide a coordinated approach to managing modern slavery risks across the business. The Group meets regularly to:

- Review emerging risks.
- Monitor supplier compliance.
- Oversee awareness and training initiatives.
- Investigate and escalate concerns.
- Monitor progress against improvement plans.
- Share lessons learned and best practice.

The Group plays a key role in driving continuous improvement and ensuring accountability throughout the organisation.

Due Diligence and Risk Management

We apply robust due diligence processes across our workforce and supply chain to identify and mitigate risks associated with modern slavery.

Our activities include:

- Supply chain mapping and risk assessment.
- Classification of suppliers into high, medium and low-risk categories.
- Supplier onboarding assessments.
- Supplier audits and compliance reviews.
- Evaluation of modern slavery risks associated with new suppliers.
- Risk-based reviews of labour providers and subcontractors.
- Continuous supplier development and engagement.
- Enforcement measures for non-compliant suppliers.
- Use of contractual clauses permitting audits and termination where ethical standards are not met.

Procurement personnel continue to work towards Chartered Institute of Procurement and Supply (CIPS) accreditation to strengthen ethical procurement standards and professional capability.



Recruitment and Workforce Protection

Our recruitment and onboarding processes align with Home Office Right to Work requirements and include document verification and additional checks designed to identify indicators of worker exploitation. We use approved recruitment agencies and conduct audits to assess compliance with our standards. Salaries are paid directly into employees' own bank accounts to support financial independence and transparency.

To further strengthen protections, Bywaters has introduced a worker declaration process requiring employees to confirm that neither they nor their family members have paid recruitment fees, incurred recruitment debts, or surrendered personal identity documents in order to secure employment.

We are also committed to ensuring that important workplace information is communicated in a format employees can understand. Where English is not an employee's first language, reasonable steps are taken to ensure policies, procedures, training materials, health and safety information, and employment-related communications are accessible and understood.

Training and Awareness

Awareness and education remain central to our modern slavery strategy.

All managers complete mandatory modern slavery training through our dedicated e-learning programme, covering:

- Recognising signs of exploitation.
- Understanding legal obligations.
- Identifying risk indicators.
- Escalation procedures.
- Appropriate interventions and reporting mechanisms.

Operational employees receive Modern Slavery Toolbox Talks, while awareness campaigns are delivered across the business annually. Suppliers may also be provided with training resources where required following audits or risk assessments.

Our awareness campaign continues to use the message:

"Every Voice Matters: Speak Up, Stop Exploitation."

Supporting posters are displayed throughout operational areas and include information on warning signs, reporting routes, confidential support services, and QR-code access to reporting channels.



Measuring Effectiveness

We monitor the effectiveness of our approach through regular audits, performance indicators, and governance reviews.

Our key performance measures include:

- Completion rates of employee training.
- Supplier due diligence activities.
- Number and quality of supplier audits.
- Awareness campaign participation.
- Reporting and escalation activity.
- Incident response times.
- Implementation of corrective actions.

Findings from supplier audits and risk assessments are reviewed by senior management and reported to the Board, ensuring transparency and accountability at the highest level of the business.



Continuous Improvement

Our Continuous Improvement Plan remains fundamental to our modern slavery strategy. Through quarterly reviews by the Modern Slavery Working Group, we assess emerging risks, monitor performance, and implement corrective actions where necessary. This supports enhanced due diligence, stronger supplier engagement, increased reporting confidence, and improved protection for vulnerable workers.

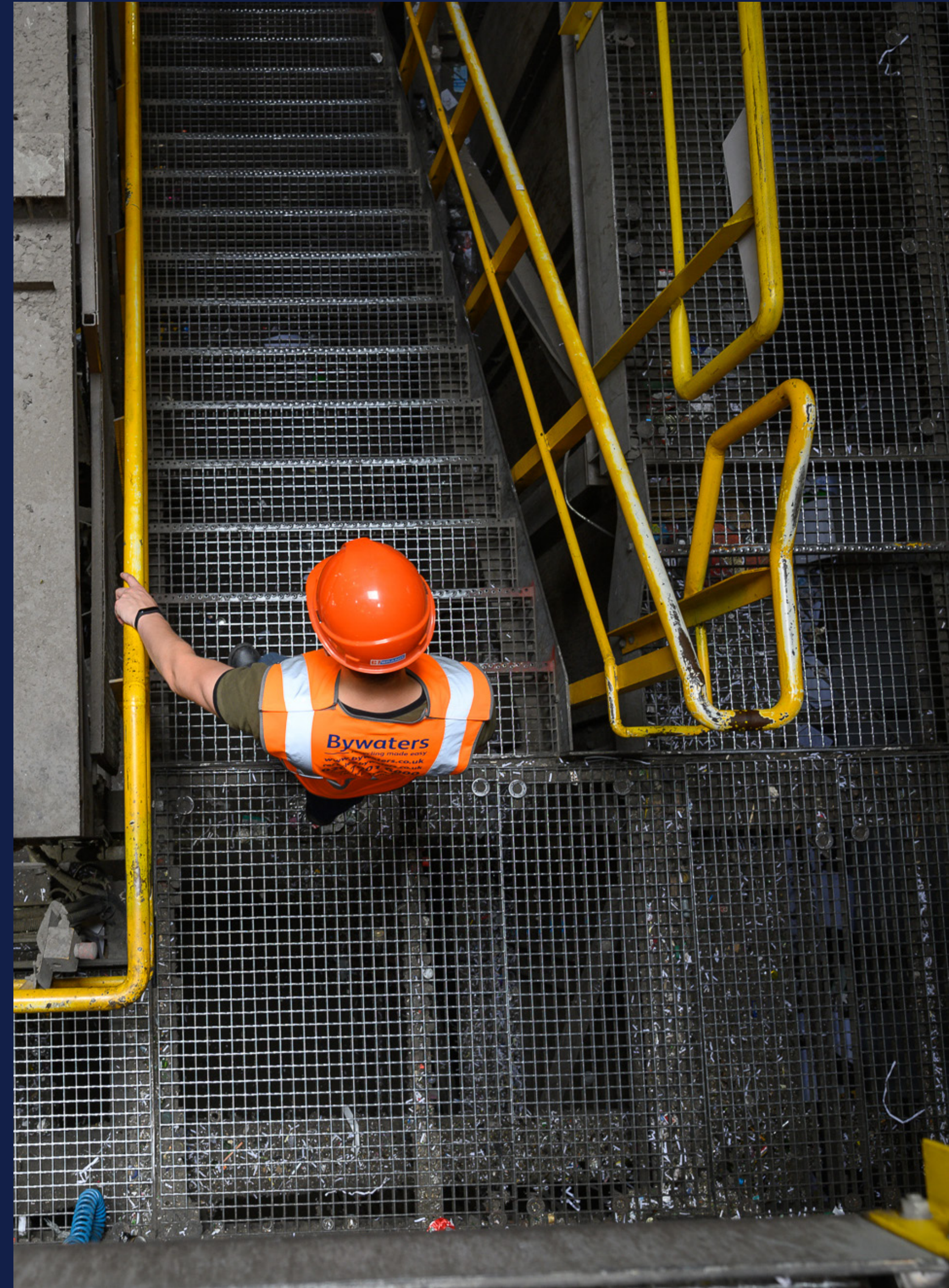
The plan also strengthens collaboration with industry partners through the IPHR Protocol and contributes to increasing transparency throughout our operations and supply chain.

Looking Forward

During 2026, Bywaters will continue to strengthen its modern slavery programme by:

- Expanding supplier engagement and audits.
- Enhancing risk assessment methodologies.
- Increasing workforce awareness and training coverage.
- Improving accessibility of materials for diverse workforces.
- Strengthening reporting and response arrangements.
- Further embedding ethical labour practices throughout our supply chain.
- Promoting transparency and collaboration across the waste and recycling sector.

Bywaters remains committed to protecting human rights, supporting vulnerable workers, and playing an active role in the eradication of modern slavery and human trafficking.



The progress we have made so far...



Signed by: Anne Sanni
Position in company: Associate Director
Human Resources
Date: September 2026

