

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out the actions that Grundon Waste Management Ltd (Grundon) has taken during the financial year, 1st October 2023 to 30th September 2024, to identify all potential modern slavery risks related to the business and the provisions made to ensure there is no slavery or human trafficking within the business or our supply chain.

As part of the waste and recycling sector, we recognise the risks of modern slavery and human trafficking associated within our industry and understand our responsibilities to take a robust approach to modern slavery and human trafficking. Grundon is absolutely committed to preventing modern slavery and human trafficking in all its activities, and to ensuring that our supply chains are free from modern slavery and human trafficking.

Organisational Structure and Supply Chain

Directly employing over 850 people, Grundon operates from 13 sites solely within the United Kingdom, predominantly in the South of England, providing a total waste management service for the reduction, reuse, recycling, recovery and disposal of waste, delivered via a combination of specialist services, contract management and the operation of our own facilities.

Our supply chain includes other waste and recycling businesses, as well as several businesses who supply goods and services to Grundon. Additionally, we supplement our own workforce with labour procured through third-party providers, and although we have procedures and steps in place to ensure third-party labour providers are assessed against their obligations in relation to the Modern Slavery Act 2015, we recognise that the provision of labour through these third parties presents a higher risk.

Policies in relation to Modern Slavery and Human Trafficking

Our Compliance and Human Resources teams periodically review our policies and procedures as our knowledge and understanding of the risks of modern slavery and human trafficking develops.

Grundon operate the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Recruitment Policy

Our Recruitment Policy sets out how we conduct our recruitment process, including conducting relevant checks to ensure as far as possible, that an individual is not subject to human trafficking or modern slavery.

Selection and Approval of Recruitment Agencies and Suppliers (Temporary Labour), and Selection and Approval of Contractors and Suppliers

We are committed to ensuring that our suppliers adhere to the highest standards of ethics.

Recruitment Agencies and Suppliers who provide labour to Grundon are required to provide examples of how they adhere to their obligations towards preventing modern slavery and human trafficking, and outline their recruitment and selection methods, through our comprehensive compliance questionnaire. Where Managed Service contracts are in place, we ensure that there are provisions within the contracts that stipulate our expectations towards the recruitment and employment of workers, including the use of second-tier suppliers.

All appropriate suppliers and contractors are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Any contractor or supplier, including recruitment agencies and labour providers, who acts in an unlawful manner will have their contract terminated immediately and will be removed from the Company's approved supplier system.

Grievance and Whistleblowing Policy and Procedure

Our Grievance Policy and Procedure was reviewed in January 2024 by our Human Resources team and Compliance team, details of this procedure are communicated to employees via Tool Box Talks, and through the robust new employee induction programme, this programme includes the additional procedures around Whistleblowing, including the confidential, internal hotline for employees to anonymously and confidentially raise concerns, this procedure and policy is also displayed in all sites via TV screens and posters.

Equality and Diversity Policy and Procedure

Our Equality and Diversity Policy and Procedure was reviewed in November 2024 by our Human Resources and Compliance teams. Grundon believes that every employee regardless of whether they are directly or indirectly employed (through a third party) has the right to be treated with dignity and respect as an individual within an environment that supports them. Grundon is therefore committed to promoting equal opportunity and preventing unlawful or unjustifiable discrimination. Details of this policy and procedure are communicated to employees via Tool Box Talks, and through the robust new employee induction programme.

Due Diligence Process of the Managed Service Provider

Grundon engaged with a third-party supplier, namely ALS Managed Services Limited, in February 2023, to provide a Managed Picking Service at three of our recycling locations: Colnbrook near Heathrow Slough, Leatherhead in Surrey and Bishop's Cleeve near Cheltenham.

ALS Managed Services are bound by our robust Selection and Approval of Recruitment Agencies and Suppliers (Temporary Labour), and Selection and Approval of Contractors and Suppliers, and ALS Managed Services Ltd checks, include welfare interviews, Modern Slavery training, Tool Box Talks, posters and communications, Right to Work checks and address checks on all workers. At every site there is an ALS supervisor who supports the ALS employees and has regular contact with both ALS and Grundon site supervisors. When Grundon operational teams visit sites with ALS employees, check ins also take place with the team.

Random checks by ALS management, were conducted during the year, and who are independent of the on-site team. All workers have access to confidential whistleblower helplines as well as external support from Unseen UK, Stronger Together and Hope for Justice. Collaborative initiatives are planned for 2025 and beyond to ensure a joined-up, strategic approach to promote the wellbeing and safety of the workforce.

In April 2024, a labour standards audit of ALS People took place. We have worked closely together with ALS to address any corrective and preventative actions which were identified, we are confident all actions have been actioned and will be requesting another audit by Fast Forward, part of Stronger Together in 2025, as we have continued to engage with them, and have commissioned a further years' contract with Fast Forward commencing in February 2025,

Risk Assessment and Management

Risk assessment and management of agency workers in relation to modern slavery and human trafficking is crucial for ensuring ethical and legal compliance. ALS Managed Services Ltd consult closely with Grundon to ensure confidence that they are conducting thorough risk assessments to identify potential vulnerabilities within their supply chains and employment practices. This involves evaluating the recruitment processes, working conditions, and contractual agreements of agency workers to detect any signs of forced labour or exploitation. Implementing robust management strategies, such as regular audits, employee training, and clear reporting mechanisms.

Key Performance Indicators to Measure Effectiveness of Steps Being Taken

Working closely with ALS Managed Services Ltd we have tracked the implementation of corrective actions following the 2024 Fast Forward audit, and the compliance rate with ethical recruitment practices are crucial metrics. Regularly reviewing and analysing these KPIs helps us, and ALS Managed Services Ltd identify areas for improvement, ensuring continuous progress in combating modern slavery and human trafficking.

Training on Modern Slavery and Human Trafficking

Training took place for all operational leads on modern slavery and human trafficking when we commenced using a managed service. We will be rolling out a new learning management system (LMS) in 2025, and we will be creating online training on modern slavery and human trafficking, and we will be rolling this out to all operational supervisor employees, as part of mandatory training, and as part of our new employee induction.

Commitments for 2024/25

- Further develop procedures, processes, and awareness to better assess the risks of a supplier or contractor in relation to preventing modern slavery and human trafficking, to include but not exhaustive to further develop induction of contractors in relation to modern slavery and human trafficking
- Further develop policies and procedures to ensure our own internal processes support best practice in relation to preventing modern slavery and human trafficking
- Develop and use training on modern slavery and human trafficking through the introduction of a new learning management system (LMS) and incorporate this into the new employee induction
- Conduct further reviews of our supply chains

Board Approval

This statement is published on our Company website and will be reviewed annually to ensure ongoing compliance and with our obligations under the Modern Slavery Act 2015 and has been reviewed and approved by the Board of Directors.

Clayton Sullivan-Webb
Managing Director

28th January 2025

