

## **HUMAN TRAFFICKING AND MODERN SLAVERY PREVENTION POLICY**

This policy statement sets out the steps taken by REMONDIS JBT to prevent modern slavery and human trafficking, as far as is reasonably possible, in its business and supply chain. Although not yet subject to the legislation, by following this policy, REMONDIS JBT seeks to meet the responsibilities of Companies under the Modern Slavery Act 2015.

Modern slavery is a crime and can take many guises but its simplest definition is: Any form of enforced or coerced labour breaching an individual's basic human rights. The Directors of REMONDIS JBT believe that the only way to stop this from happening is to be transparent in their hands on approach to tackling this global issue. This policy therefore has their full support and commitment.

REMONDIS JBT has added this policy to its audited management system which follows the principles of continuous improvement and will therefore regularly review the Company's performance against this policy statement. Setting new SMART objectives each time to further reduce the risk of Human Trafficking and Modern Slavery occurring in any part of its operations.

A link to this policy can be found both on our own website and that of our ultimate parent company REMONDIS International GMBH. It is also included in employee handbooks and displayed in the head office of REMONDIS JBT and on employee notice boards to encourage transparency and highlight the importance of following the policy.

The policy is to be applied to all persons, at all levels, working for or with the Company whether they are employees, directors, contractors, agents, interns, volunteers, external consultants, third party representatives or business partners.

## **MEASURES TAKEN WITHIN REMONDIS JBT**

To prevent modern slavery occurring within our own work force we have several key policies and procedures which form part of our continuous improvement management system:

- Recruitment policy which involves right to work checks being carried out for all new employees or individuals offered a role within REMONDIS JBT.
- We have a robust bullying and harassment policy which is communicated to all our staff in their employee handbook and have an open door policy to all levels of management so that any concerns an employee has can be addressed quickly and confidentially.
- We also carry out risk assessments to protect vulnerable groups of employees such as those who are classed as young workers, apprentices or those here with us on work experience.

By primarily recruiting directly we have greater control in ensuring none of our own employees have been forced into labour and have the right to work in the UK. On the occasions we use recruitment agencies, due diligence is carried out on the agency and we only use approved reputable recruitment agencies.

REMONDIS JBT also follows the Rethman Group Corporate Compliance Policy which can be found through our website.

## **MEASURES WITHIN OUR SUPPLY CHAIN**

As part of the REMONDIS JBT management system all potential suppliers are audited to assess whether they meet the standards we require. This includes assessing whether they are taking reasonable steps to prevent human trafficking and modern slavery. Once a satisfactory audit result is obtained they are placed on our approved supplier list. This list is reviewed annually and any non-conformances by suppliers are investigated to assess whether they should remain on the approved list.

As we know that not all our suppliers will be required to publish modern slavery statements we work with them, especially our smaller suppliers, to ensure that they have minimised the risk of modern slavery occurring amongst their workforce.

The areas covered in a supplier audit are:

- Bullying and harassment procedures;
- Health and Safety procedures and record;
- Environmental procedures and record;
- Whistleblowing and ethics procedures.

Our supply chain mainly consists of subcontracted UK hauliers, large plant and equipment manufacturers and suppliers of overhead resources such as utilities and office supplies. If we become aware that anyone in our supply chain has been involved in human trafficking or modern slavery whether knowingly or through failing to take all steps to prevent it, they will be removed from our approved supplier list and will have to wait a minimum of 6 months before being able to reapply to be an approved supplier. They will also have to demonstrate that they have improved their policies and procedures to ensure that the breach which allowed modern slavery to happen has been rectified.

#### **RESPONSIBILITY FOR POLICY ADHERENCE**

Although all employees are expected to adopt and promote this policy the ultimate responsibility lies with the board of directors of REMONDIS JBT.

Managing Director

REMONDIS JBT (JBT Waste Services Ltd)

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Graham A Palmer

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