



# Modern Slavery Statement May 2017





# Modern Slavery Statement - May 2017

This statement sets out Biffa's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year ending 24 March 2017.

## Introduction

Slavery, servitude, forced labour and human trafficking (Modern Slavery) is a world-wide and growing issue given the rapid rise in global migration. The sector in which we operate can be attractive to perpetrators of this type of crime so as a leading integrated waste management and recycling business in the UK, the company recognises the need to adopt a robust approach to slavery and human trafficking. Biffa has a zero tolerance approach to Modern Slavery of any kind within our operations and supply chain and staff are expected to report concerns, using the appropriate reporting channels, and we are committed to act upon any such reports.

For the purposes of this statement "Biffa" refers to all legal entities within Biffa plc.

## Organisational structure and supply chains

Established in 1912 Biffa operate at over 190 sites across the United Kingdom providing, waste collection, recycling, treatment and energy generation services. Our business headquarters are in High Wycombe, UK and we employ over 7,400 people across the group.

We have relationships with external businesses to source labour and materials/waste for our business. The majority of our suppliers are UK companies.

We procure under the Code of Ethics of the Chartered Institute of Purchasing & Supply. Suppliers of goods and services to Biffa must comply with all relevant legislation and international standards as relevant to their industry, including, child and forced labour, health and safety of workers, non-discrimination, employment law, human rights, fraud, bribery and corruption.

In the past year we have increased our focus on Modern Slavery within our wider business operations, and the supply chains. Having reviewed our supply chain we have identified the provision of labour through managed service contracts and recruitment agencies as a potential area of risk.

We maintain regular contact with our managed service providers through onsite Account Managers and hold regular meetings to discuss their actions in regard to preventing modern slavery in their business. In their statement our managed service provider advises that they are 'committed to the highest standards of ethical conduct and integrity in its business activities and has a zero tolerance policy against slavery and human trafficking.'

As part of this commitment they are pursuing membership of Stronger Together Partners (<http://stronger2gether.org/>) who provide guidance, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation.

## Relevant policies and practices

Biffa has in place the following policies and practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Anti -Slavery and Human Trafficking policy and procedure** - reiterating our stance against all forms modern slavery, the policy outlines our procedures and processes which are designed to guard against the occurrence of modern slavery or human trafficking in our business operations and supply chain.



- **Whistleblowing policy and procedure-** encourages our employees to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our independently provided whistleblowing hotline provides an easy and confidential means for concerns and allegations to be raised. We investigate every whistleblowing case and seek to achieve resolution within the shortest possible timescales.
- **Employee Assistance Programme** – provides an external and confidential support service by telephone through which advice and information are imparted to employees across a wide range of topics.
- **Supplier code of conduct** - Biffa insists on ethical standards from all of our suppliers. Suppliers are required to confirm that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **Recruitment policy and procedure-** Biffa operate a preferred supplier list, and works only with recruitment agencies which share our commitment towards anti-slavery and the prevention of human trafficking.

## Due diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- reviewing the supply chain broadly to assess particular product, sector or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;

## Training and Awareness-raising Programme

- We are working with 'Hope for Justice' (<http://hopeforjustice.org/united-kingdom/>), an international anti-human-trafficking charity, to put a program in place to promote awareness of modern slavery. This has been prioritised in the areas of our business operations where the risk of modern slavery practices have been assessed to be the greatest and includes:
  - Training for team leaders and supervisors
  - The distribution of a multilingual employee newsletter and posters
  - Workshops, with multilingual outreach workers who attend site and speak directly to staff and workers onsite
  - Regular review meetings with our managed service and agency workers provider

## Performance indicators

The company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the company is:

- Developing training / awareness programme for managers. This will initially focus on team leaders and supervisors in specified business operations identified through our risk

assessment and where the greatest potential for modern slavery practices to exist have been assessed by October 2017

- Requiring all potential new suppliers to successfully complete our procurement due diligence processes (including the modern slavery and human trafficking questionnaire) before they enter our supply chain by April 2017
- Requiring all existing suppliers to successfully complete our procurement modern slavery and human trafficking questionnaire. Initially, we will focus on suppliers identified through our risk assessment as being those where the greatest potential for modern slavery practices exists. This initial phase to be complete by May 2017.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the Biffa anti-slavery and human trafficking statement for the financial year ending 24 March 2017.

This statement has been approved by the board of Biffa plc, who will review and update it annually.



Ian Wakelin  
Chief Executive Officer, Biffa  
Date: 31 May 2017