

Modern Slavery and Anti Human Trafficking Statement

FY 2022-2023



Biffa

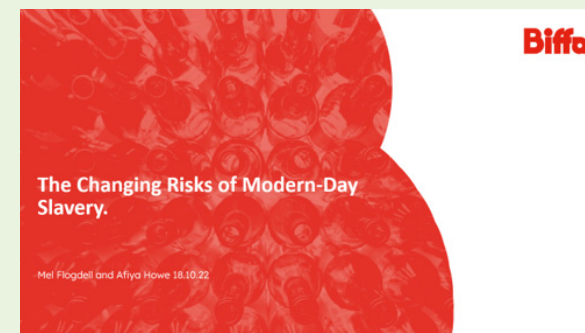
2023 Highlights

We have reviewed and **updated our MS e-learning**, ensuring that colleagues were aware of the changing risks presented to our business.

We **commissioned Slave-Free Alliance (SFA)** to complete threat assessments of Company Shop Group and Simply Waste.



We rolled out **all employee briefing on the changing risks of Modern Slavery** and actions individuals can take to stay vigilant and spot the signs.



We continue to be steering group members of the **IPHR (Indirect Procurement and Human Rights) Forum** chaired by the Co-op and were a key contributor to the creation of a Modern Slavery Protocol for the Waste and Recycling Sector.



We continued our **collaboration with Ride for Freedom (RFF)** to raise awareness of MS, Child Trafficking in Sport and following the successful pilot last year supported the launch of the West Midlands 'Freewheel' programme empowering survivors of Modern Slavery to Cycle.



We held RFF events, working alongside Birmingham City Football Club raising awareness and **fundraising for #RideForFreedom2021** symbolising our commitment to end Modern Slavery in the waste industry and fundraising for #RideForFreedom2022.



A foreword from our Chief Executive Officer

At Biffa, we have a zero-tolerance approach to Modern Slavery and Human Trafficking.

We are committed to raising awareness on both the very real issue we face globally, as well as becoming an acknowledged industry leader in anti-slavery practices.

In line with our three-strand strategy of Raising Awareness; Strengthening our Response to the Threat and Victim and Survivor Support, we continue to review and develop our approach to Modern Slavery (MS) and have made further progress this year.



Michael Topham, CEO

Modern Slavery Statement

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 March 31st, 2023.

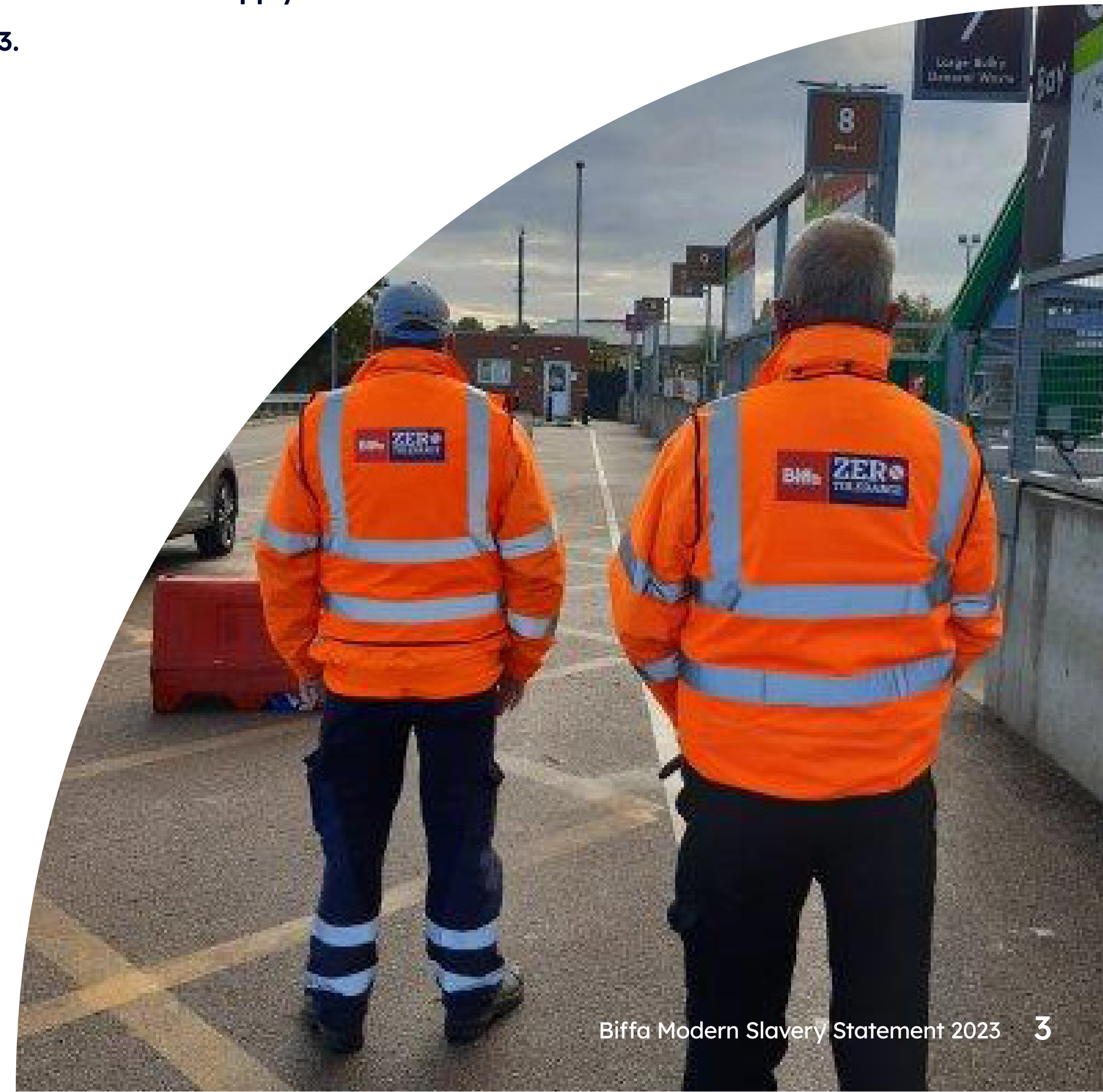
1. Introduction

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 employees are expected to report concerns, using the appropriate reporting channels, and we are committed to act upon any such reports.

Our commitment to creating an environment free from Modern Slavery, is embedded in our strategy vision and purpose to lead the way in achieving a sustainable future for the UK, helping to change the way people think about waste. The 2020 launch of our Sustainability Strategy: Resourceful Responsible reflects this in one of our three pillars; Caring for our people, supporting our communities.

For the purposes of this statement 'Biffa', 'our' and 'we' refers to Biffa Topco Limited and its subsidiary companies.



2. Organisational structure and supply chains

Established in 1912, we have been at the forefront of the UK's waste industry for over 100 years, starting up at a time when waste management simply meant taking it away.

Today, we provide organisations of all shapes and sizes with cost-effective, sustainable ways to manage waste, lessening its impact on the environment and even transforming it into valuable resources. Our business headquarters are in High Wycombe, UK and we directly employ about 10,000 people across the group.

We have relationships with external suppliers, to source labour through managed service and agency arrangements, and materials and services for our business. The majority of our suppliers are UK companies.

We procure under the Code of Ethics of the Chartered Institute of Procurement & 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, anti-bribery, and corruption.

In the past year we have continued our focus on Modern Slavery within our wider business operations, and the supply chain. The provision of labour through managed service contracts and recruitment agencies remains an area of risk.

We maintain regular contact with our managed service provider through onsite Account Managers and hold regular meetings to discuss actions in regard to preventing Modern Slavery in their business, including an annual strategic review with their Chairman and our CEO.

We expect our labour providers to understand all potential modern slavery risks and to put in place steps that are aimed at ensuring there is not slavery or human trafficking in their own business and its supply chains. As part of their commitment, our labour providers are members of/licensed by Stronger Together Partners, Slave-Free Alliance, Gang Master Labour and Abuse and Association of Labour providers all of whom provide guidance, resources and a network for employers, labour providers, workers, and their representatives to work together to reduce exploitation.



3. Raising awareness

Slave-Free Alliance and Hope for Justice

We have continued our membership of the Slave-Free Alliance, after becoming a founder member in October 2018, reinforcing our commitment to making Biffa a slave free workplace.

The Alliance is part of Hope for Justice, an international anti-human trafficking charity with whom Biffa continues to work very closely. We continue to raise awareness of our partnership with Hope for Justice and our work to prevent slavery within Biffa and our supply chain, in particular annually marking Anti-Slavery Day along with Hope for Justice, Slave-Free Alliance and other link minded organisations.

We continue to raise money via our 'Freedom Walls' for Hope for Justice to help to continue the fight against slavery. The Freedom Walls are located at our Head Office in High Wycombe and our office in Barlborough, as a reminder of the work being done to tackle Modern Slavery. Colleagues can donate to purchase a padlock and display it on the walls. Each padlock represents someone who's been freed from Modern Slavery.



SLAVE-FREE
ALLIANCE

Working Towards a
Slave-free Supply Chain



HOPE FOR JUSTICE

Indirect Procurement Human Rights (IPHR) forum

We remain active steering group members of the Indirect Procurement Human Rights (IPHR) Forum, a truly cross-industry working group to address Modern Slavery and human rights in the sector and facilitate collaborative responses to shared risks.



Over 20 different organisations actively participate in the group, representing brands, retailers, waste service providers, government bodies and NGOs. This year we were a key contributor to and signatory of the creation of a Modern Slavery Protocol for the Waste and Recycling Sector. The protocol was launched in a webinar on Anti-Slavery Day, on which we co-presented with other members of the steering group. The Protocol is a voluntary agreement between organisations and is a public pledge of commitment to work collaboratively to tackle Modern Slavery and prevent exploitation or abuse of workers.

We have furthered our engagement with external audiences and using our voice to raise awareness and share best practice for example presenting at the Greater Manchester Modern Slavery Business Network to share our experiences and approach to Modern Slavery and the risks in the Waste Sector.

Collaboration and working with these organisations provides knowledge and resources to give us the tools we need to not only identify the risk of Modern Slavery in our business and supply chain, but to raise awareness in our communities and wider industry. We look forward to continuing our work with them.



Ride for Freedom

We have renewed our efforts in our existing partnership with Modern Slavery campaigner Gordon Miller on his Ride for Freedom awareness campaign. The social enterprise's mission is to utilise the universal appeal and power of cycling to deliver positive social impacts and specifically to raise awareness of Modern Slavery.

Gordan and his team, alongside our Biffa colleagues have participated in a number of initiatives to raise awareness and provide direct support to survivors of MS. Following the successful pilot of the Freewheel campaign in 2021, an initiative designed to empower survivors we supported the launch in October 22 of a 2nd Freewheel hub in the West Midlands. To learn more see [Freewheel West Midlands - Ride for Freedom](#)

In addition, colleagues around the business remain engaged on this issue and have participated in a number of events using the power of cycling to raise awareness including, this year coinciding with UN World Humanitarian Day, and to raise awareness of MS (in sport) Gordon and a team of Biffa colleague's and ex-professional footballer Dave Hodgson cycled from Newcastle United FC via Sunderland, Hartlepool Utd, and Middlesbrough to finish at Darlington's home ground, Blackwell Meadows.

The 73-mile ride follows on from the 'Show Slavery a Red Card' campaign that shines a light on human/child trafficking in football.

To coincide with the Freewheel Hub launch and the 'Show Slavery a Red Card' Campaign we worked with Birmingham City Football Club, parking a Biffa Zero tolerance vehicle (insert image) at St Andrews on match day. Gordon Miller also attended as guest speaker providing some insight into the risk of MS and the RFF cause on the day.

We continue to expand our knowledge and network of best practice attending various forums and events on the issue including being members of the Indirect Procurement Human Rights Forum (IPHR) chaired by the Co-Op and are founder members of the Waste & Recycling Working Group, jointly led by ESA and the Slave-Free Alliance (SFA), as well as attendance at SFA seminars.



19 colleagues
took part in Ride for Freedom
raising over **£2,000**



4. Relevant policies and practices

Our approach to addressing Modern Slavery sits within our wider ethical and inclusivity agenda. 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 and outlines support for victims and survivors identified in our employment or supply chain.

Modern Slavery guidance for managers

In our work context the most likely type of Modern Slavery would be forced labour. This guide helps managers to understand the signs which may indicate a person is a victim of Modern Slavery and how to respond if a potential victim is identified and what support is available.

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 a 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 or agency/managed service labour, across a wide range of topics.

Supplier ethical standards

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.

Sustainability Strategy: Resourceful Responsible

We conduct our business with honesty, integrity, fairness and respect and encourage all our employees to embrace these principles. Our employee handbook sets out our expectations and we also work with our supplier partners to achieve the highest standards of responsible sourcing, sustainability and human rights.



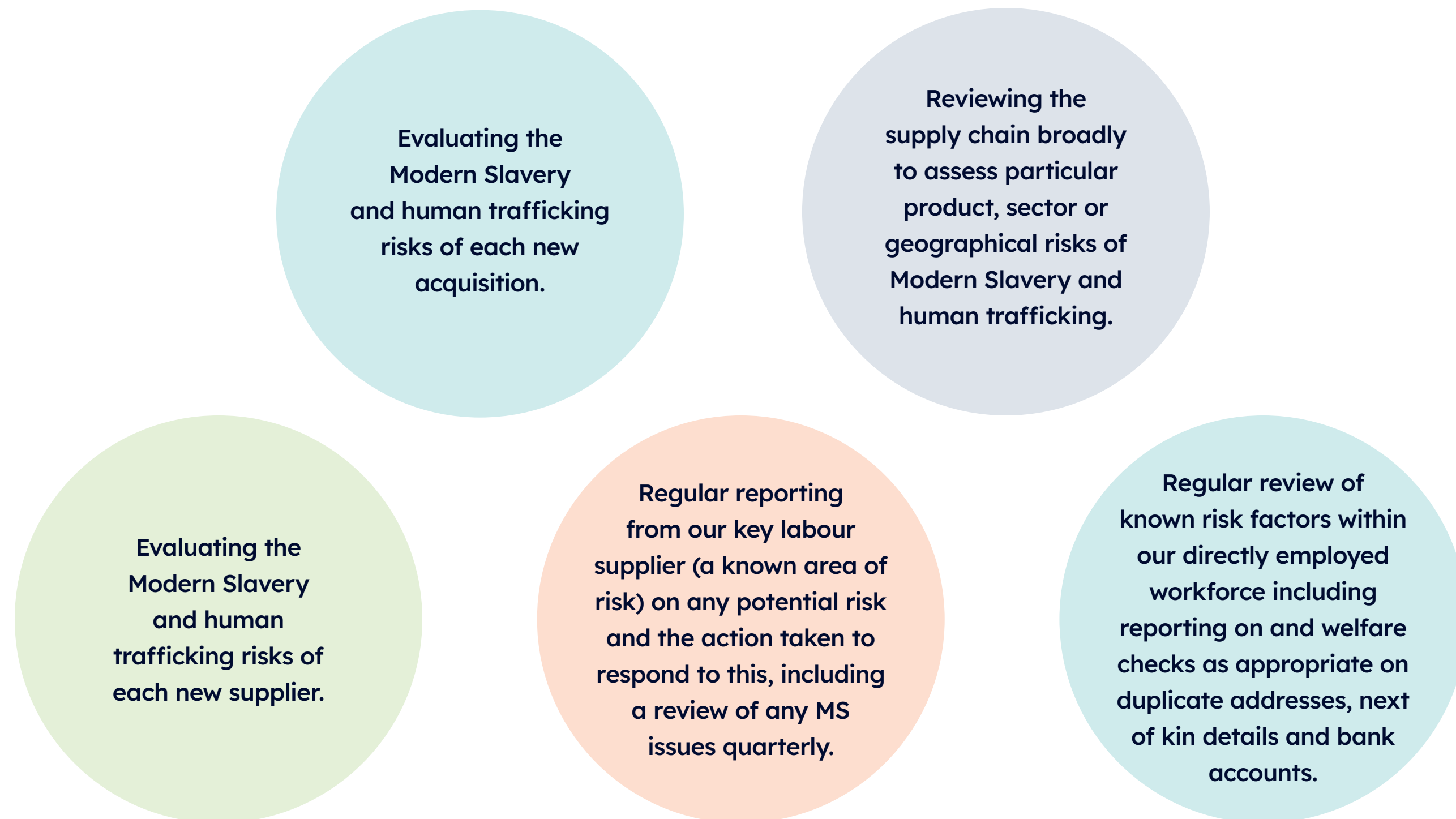
5. Due diligence

Our approach to Modern Slavery is sponsored by the Group HR Director and Chief Operating Officer, Resources & Energy who are both Executive Team members.

We also have an internal Modern Slavery working group that consists of HR, Operations, Procurement and internal Risk and Audit, which meets regularly, to monitor progress against our Group Modern Slavery statement and plans.

Where any issues are raised the working group act to ensure that matters are responded to quickly and effectively. Our management and colleague guidance outlines clear procedures to ensure that everyone is aware of how to raise any issues.

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



6. Internal training and awareness-raising programme



We work with '[Hope for Justice](#)', an international anti-human-trafficking charity, to provide a programme promoting awareness of Modern Slavery. This has been prioritised in the areas of our business operations where the risk of Modern Slavery practices has been assessed to be the greatest and includes:

General training and awareness of Modern Slavery for line managers, 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.

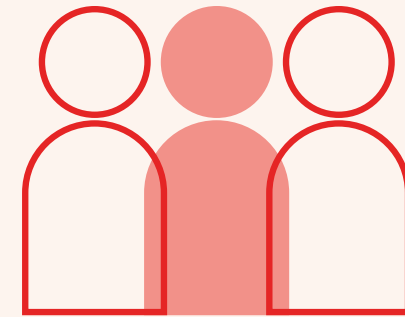
- ✓ Modern Slavery is included in induction and on-boarding literature to ensure all employees have an awareness of the issue and know where to go for more information, right from the very beginning of their working life with Biffa.
- ✓ MS is included in our labour providers induction at all Biffa locations and the following video is shown in multiple languages to ensure awareness is raised around MS, particularly forced labour. [Click to watch](#)
- ✓ Training is delivered to all online employees across the group via an e-learning module. The training forms part of our mandatory compliance programme and includes an assessment that needs to be passed in order to successfully complete the training.
- ✓ Modern Slavery Toolbox Talk is provided to frontline colleagues with access via our employee app to improve accessibility. There is also a section on Modern Slavery incorporated into our Driver CPC training.
- ✓ We run communication and awareness raising campaigns throughout the year, across sites, on our intranet, through our employee app and social media channels including briefing all employees on changing risks of MS, spotting the signs of the different types of Modern Slavery and how to report concerns to coincide with International Anti-Slavery Day.
- ✓ Regular review meetings are held with our managed service and agency workers provider.



7. Progress report 2022-2023

We continue to review and adapt our approach to MS in line with our three strand strategy focusing on:

i. Raising awareness



Biffa is fully committed to stamping out Modern Slavery in our organisation and communities.

We are proud of the efforts we have made to raise awareness of human trafficking and MS and will continue to champion internal and external campaigns promoting awareness of this important global issue across our business, supply chains and wider industry.

ii. Strengthening our response to the threat

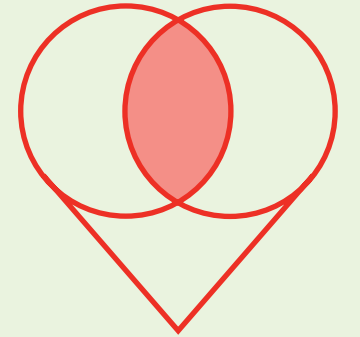


We are vigilant in our practices and policies to identify and proactively deal with any suspected issues within our organisation or supply can.

We strive to continuously improve and are not complacent to the realities of guarding against MS.

We will ensure that all members of our group understand our practices and applying them vigilantly and consistently.

iii. Victim and survivor support



We will support any employees or individuals in our supply chain identified as victims or survivors of slavery or trafficking to prevent re-exploitation, and to enable rehabilitative care as appropriate.

Further we will seek opportunities to expand our support more broadly by collaborating with experienced partners to provide an appropriate, survivor centered, remediation offering.

7.1. 2022-23 progress

i. Raising awareness 2022-23 progress

- ✓ Delivered internal awareness raising campaigns and learning materials, ensuring all information shared is up to date, recognising changing risks and aligned to our strategic objectives around MS.
- ✓ Ensured our workforce were informed of the risks of MS and the organisation's commitment as early as possible after joining Biffa and that a preventing MS slavery mindset is embedded in our culture.
- ✓ Expanded on awareness raising campaigns beyond our internal environment, seeking opportunities to engage more widely externally e.g. through the IPHR forum and webinars, as well as through our continued partnership with Ride for Freedom, the social enterprise that undertakes inspiring cycling challenges to raise awareness of Modern Slavery. As the waste services provider for the Commonwealth Games we held meetings with and delivered an MS briefing of the organisers & their suppliers in June 2022.

ii. Strengthening our response 2022-23 progress

- ✓ SFA completed Modern Slavery risk assessments of Company Shop Group and Simply Waste. Reports were reviewed and appropriate actions established including appropriate training / awareness and reporting mechanisms and sharing best practice.
- ✓ Continued Modern Slavery due diligence / risk assessments on suppliers. We have maintained a completion rate of 100% of new suppliers having completed our Modern Slavery questionnaire and this measure is regularly reviewed.
- ✓ We have identified waste disposal as an area of risk and have been conducting deeper dive reviews with long standing waste disposal suppliers. In the year we have 50% of all waste disposal partners fully signed up to our expected standards regarding MS. This year we are in the process of collecting the remainder to get to 100% completion through the supplier cleanse program as only suppliers that have signed up to MS will be able to be re-onboarded to the system.
- ✓ Continuation of internal onsite audits that include questions about Modern Slavery. Additionally, our internal audit department have reviewed our approach to MS and how this is embedded in the organisation to ensure that our processes and systems remain fit for purpose, are well understood, actions are evidenced and that gaps are identified to support continuous improvement.
- ✓ Key contributor to and signatory of the IPHR (Indirect Procurement for Human Rights) MS Protocol for the waste sector.

iii. Victim and survivor support 2022-23 progress

- ✓ In partnership with Ride for Freedom 'Freewheel' programme we have supported the roll out of freewheel hubs across the UK and as partner for the Midlands Freewheel hub raised awareness of and facilitated the launch in October 22.

7.2. Targets for 2023-2024

Our target actions for the coming year and beyond are aligned to our Modern Slavery strategy:

i. Raising awareness 2023-24 target

- ✓ Continue to review and re-energise internal awareness raising and learning materials and ensure all information shared is up to date accurate and aligned to our strategic objectives around MS.
- ✓ Ensure our workforce are informed of the risks of MS and the organisation commitment as early as possible after joining Biffa. And that a preventing MS slavery mindset is embedded in our culture. Specifically, we will review and update our MS e-learning module, which is available to all 'online' employees and will review and update our Toolbox Talk for frontline colleagues.
- ✓ Continue to take a collaborative approach, as appropriate, to build on understanding in our stakeholder groups and beyond and encourage all of our communities to spot signs and report concerns. Expand on awareness raising campaigns beyond our internal environment, seeking opportunities to engage more widely externally e.g., at panel discussions or conferences, through our MS working groups etc.

ii. Strengthening our response 2023-24 target

- ✓ We have been a member of the SFA since 2018. This year we will conduct a review of our Strategy on MS to explore what more we can do.
- ✓ We will continue to complete Modern Slavery due diligence / risk assessments on suppliers. We will maintain a completion rate of 100% of new suppliers having completed our Modern Slavery questionnaire (currently at 100%) and will ensure findings of questionnaires are discussed with suppliers at regular review meetings sharing best practice as appropriate.
- ✓ Having identified waste disposal as an area of risk and conducting deeper dive reviews with long standing waste disposal suppliers next year we will continue this process completing the remainder, to get to 100% completion through our supplier cleanse program. Only suppliers that have signed up to MS will be able to be re-onboarded to the system.
- ✓ Any acquisitions completed in 2023/24 will have a Modern Slavery risk assessment conducted, and appropriate training / awareness and reporting mechanisms will be considered and deployed, as necessary.
- ✓ Continue conducting internal onsite audits that include questions about Modern Slavery and re-publish the MS mangers checklist to support sites in understanding the risks in their environment and the internal resources available to support.

iii. Victim and survivor support 2023-24 target

- ✓ Where possible collaborate with labour partners and enterprises, to support employment and survivor schemes.

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 31st March 2023.

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



Michael Topham, CEO

September 2023



Biffa

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in England & Wales.

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