BIFFA 2021
MODERN SLAVERY STATEMENT
2021 Highlights

Slavery, servitude, forced labour and human trafficking is a worldwide and growing issue. Sadly, while it persists, many businesses, across a wide range of industries, must recognise and mitigate risk in their own supply chains and labour force. The disruption caused to businesses by the Covid-19 pandemic since it began and the opportunistic nature of the perpetrators of modern slavery means that many organisations and their supply chains have potentially become more at risk. The Slave Free Alliance, of which Biffa is a founding member, has urged businesses to be extra vigilant.

At Biffa we are fully aware of the appalling impact modern slavery has on its victims and we take a zero-tolerance approach to modern slavery of any kind. We are proud that our policies, procedures and campaigning on the issue means that the Slave Free Alliance recognises Biffa as ‘a leading example for the UK waste industry.’

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Michael Topham
Chief Executive Officer

28 September 2021

A note from our Chief Executive Officer

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MODERN SLAVERY STATEMENT — FY 2021

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 2021. During this year we faced an unprecedented time in relation to the Covid-19 global pandemic; it was therefore important that we considered the key impacts the pandemic had on Modern Slavery and the increased risk to our organisation and supply chain.

1. Introduction

“Caring for our people, supporting our communities.”

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.

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 plc and its subsidiary companies excluding Company Shop Limited and Community Shop CIC which were acquired on 25 February 2021.
2. Organisational structure and supply chains

Established in 1912 Biffa operate at over 200 sites across the United Kingdom providing, waste collection, recycling, treatment and energy generation services. Our business headquarters are in High Wycombe, UK and we directly employ about 8,000 people across the group.

We provide waste management services for 95% of UK postcodes.

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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 providers 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. In their statement our principal managed service provider advises that All those with whom we do business are expected to follow the highest ethical principles. We expect all our business partners, representatives and suppliers to have robust processes in place to eliminate the risk of modern slavery occurring in their organisations. As part of this commitment, they are continuing their membership of Stronger Together Partners (strongertogether.org) who provide guidance, resources and a network for employers, labour providers, workers, and their representatives to work together to reduce exploitation.

3. Raising Awareness

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. 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. In addition, we participated in the Hope for Justice ‘Go the Distance’ Fundraising Challenge.

This year our awareness raising campaigns included a joint awareness Campaign with Hope for Justice using 10 anti-slavery branded trucks in cities across the country to spread the zero-tolerance message. Drivers received further briefing on our work on Modern Slavery and how to spot the signs and were issued with Hi Viz vests with the ‘Zero Tolerance to Modern Slavery’ message and a collective social media push with Hope for Justice to demonstrate that the waste industry has zero tolerance to modern slavery. #wastesectorsayszero.

We also reviewed, updated and rolled out our Modern Slavery e-learning to ‘online’ colleagues and our Modern Slavery ‘Toolbox Talk’ was made more accessible for frontline operatives via our employee app. Updated Modern Slavery collateral was also developed and deployed to Managers and a Modern Slavery tile was created on our Employee App for managers and employees to access further information.

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 Waste & Recycling Working Group, chaired by the Co-Op, as well as attendance at Slave-Free Alliance seminars.

We are active members of the Indirect Procurement Human Rights (IPHR) Forum Waste and Recycling Working Group, chaired by the Co-op, is 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.

The groups vision and objectives are that through collaboration, we will drive positive change to improve the human rights of workers in waste & recycling supply chains. We aim to work together to share insights, best practice examples, build capacity and identify opportunities for collaboration.

- The IPHR group’s objectives for 2021 are to
- Identify and assess labour rights issues in the sector
- Develop shared resources to address human rights issues in the sector
- Raise awareness and engagement about human rights issues in the sector

We became founder members of the Waste and Recycling MS Working Group, jointly led by ESA and SFA, the aim of the group is to reduce the risks by working in partnership on:

- Common modern slavery challenges within the sector
- Sharing modern slavery best practice examples and ideas
- Raising awareness of modern slavery within the waste and recycling sector
- Exploring cross sector initiatives on modern slavery

We have been increasing our engagement with external audiences and using our voice to raise awareness and share best practice for example at the Policy Connect webinar on Tackling Modern Day Slavery exploring the challenges in addressing MDS, progress made since the Modern Slavery Act and emerging best practice.
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:

- **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.

- **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.

- **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.

- **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.

5. Due diligence

Our approach to Modern Slavery is sponsored by both the Group HR Director and an Executive Team member. 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.

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:

1. **Evaluating the modern slavery and human trafficking risks of each new acquisition**
2. **Reviewing the supply chain broadly to assess particular product, sector or geographical risks of modern slavery and human trafficking**
3. **Regular reporting from our key labour supplier (a known area of risk) on any potential risk and the action taken to respond to this, including a review of any MD5 issues quarterly**
4. **Regular review of known risk factors within our directly employed workforce including reporting on and welfare checks as appropriate on duplicate addresses, next of kin details and bank accounts**

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.

Biffa became aware of Modern Slavery after being targeted by traffickers through unwitting labour providers, which resulted in victims being infiltrated into some areas of our operation. This came to light as part of a police investigation in 2016 called Operation Fort and which resulted in the conviction of five individuals in 2019 for slavery-related offences. Since 2016, we have made great strides to protect ourselves from any further modern slavery penetration and continue to work to future proof our business from this threat. (View our Biffa case study that can be found on our website).
6. Internal Training and Awareness-Raising Programme

- 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 than needs to be passed in order to successfully complete the training.
- 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.
- A Modern Slavery Toolbox Talk is provided to frontline colleagues through access via our employee app to improve accessibility.
- Regular review meetings are held with our managed service and agency workers provider.

- We work with ‘Hope for Justice’ (http://hopeforjustice.org/uk), 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.

- We run communication and awareness raising campaigns throughout the year, across sites, on our intranet, through our employee app and social media channels including redistribution of a guide for spotting the signs of the different types of modern slavery and how to report concerns to coincide with International Anti-Slavery Day and Shine a Light on Slavery #enditmovement.

7. Progress Report 2020-2021

7.1. Provide general training and awareness to line managers, team leaders and supervisors:

2020-2021 – Progress
- Additional MDS briefing for our Employee Services (ESC) team. MDS Standard Operating Procedures carried out by the ESC Team were reviewed and updated.
- Training – Reviewed, updated and rolled out our MDS E-learning to all online employees and our Toolbox Talk to frontline employees – now accessible via our employee app. Also incorporated a section on Modern Slavery into our Driver CPC training and updated our induction materials with more information on Modern Slavery.
- Modern slavery presentations to the Biffa board and executive team and completion of the e-learning mean all board members, executive directors, senior leaders and managers have an awareness around modern slavery, our policies and statement. In addition, we held our annual strategy/governance meeting with our labour provider’s Chairman, Biffa’s CEO and with respective executive/leadership teams in attendance.
- MDS is included in Smart Solutions Induction at all Biffa locations. The following video is shown in multiple languages to ensure awareness is raised around MDS, particularly forced labour. www.strongertogether.org/product/forced-labour-in-the-uk/.
- A separate area (tile) has been created for MDS on our employee app. This allows employees ease for frontline colleagues and staff. The MDS tile create on app in Oct 2020 and was the 9th most accessed (of 19) specific areas.
- We were panel members at a Policy Connect webinar Tackling Modern Day Slavery, exploring the challenges in addressing MDS, progress made since the Modern Slavery Act, and emerging best-practice.
- Our continued partnership with Hope for Justice saw the launch of our Zero Tolerance Campaign with 10 branded trucks, branded Hi-Viz and banners nationwide and the #wastesectorsayszero.
- Modern Slavery presentations were provided to the ESC Team were reviewed and updated.
- Modern Slavery into our Driver CPC training and audits that include questions about Modern Slavery.

7.2. Complete modern slavery due diligence/risk assessments on acquisitions

2020-2021 – Progress
- Modern Slavery forms part of all supplier review meetings. Suppliers must complete a Modern Slavery questionnaire and at the first meeting any findings are discussed, and any unresolved actions will remain on the agenda until addressed. Where all issues have been addressed (or none exist) Modern Slavery will be discussed in the context of Biffa’s ongoing commitment and what suppliers could and/or should be doing to support.
- We have maintained a completion rate of 100% of new suppliers having completed our modern slavery questionnaire and this measure is regularly reviewed.
- We continue to promote SFA at regular reviews, but main focus has been on Covid safe working practices. We would expect to again make this our priority in FY22.
- We keep legislation under regular review and communicate any changes to our supply base.
- We are registered and using the government portal for uploading our MDS statements.
Biffa 2021 Modern Slavery Statement

We continue to review and adapt our approach to MDS and for 2021-2022 we have developed a three strand strategy focusing on:

Raising Awareness

Our target actions for the coming year and beyond are aligned to this strategy:
Biffa is fully committed to stamping out modern day slavery in our organisation and communities, we are proud of the efforts we have made to raise awareness of human trafficking and MDS and will continue to champion internal and external campaigns promoting awareness of this important global issue across our business, supply chains and wider industry.

2021-22 – 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 MDS. Ensure all employees are informed of the risks of MDS and the organisation commitment as early as possible in their employment and that a preventing MDS slavery mindset is embedded in our culture.

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 MDS working groups and through more widely externally e.g., at panel discussions or conferences or through our MDS working groups and through our podium partnership with Ride to Freedom 2021 the social enterprise that undertakes inspiring cycling conferences, through our MDS working groups and through regular review meetings sharing best practice as appropriate.

Taking a collaborative approach, as appropriate, to build on understanding in our stakeholder groups and beyond encourage all of our communities to spot signs and report concerns.

Roll-out up to date training on MDS to key stakeholders across the business.

Introduce MDS ‘Freedom’ champions to support awareness raising and best practices across the business.

Since the Covid 19 pandemic prohibited visits to sites as restrictions are safely lifted, we will resume conducting onsite audits that include questions about Modern Slavery. In addition, we will re-prioritise promotion of the SFA at supplier review meetings.

Strengthening our Response to the Threat

Our target actions for the coming year and beyond are aligned to this strategy:
We are vigilant in our practices and policies to identify and proactively deal with any suspected issues within our organisation or supply chain. We strive to continuously improve and are not complacent to the realities of guarding against MDS.

2021-22 – Target
Any acquisitions completed in 2021/22 will have a modern slavery risk assessment conducted, and appropriate training/ awareness and reporting mechanisms will be considered and deployed, as necessary.

As priority we will carry out MDS risk assessment as appropriate on any acquisitions disrupted by the Covid 19 pandemic.

We 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.

As a planned event for FY21 was postponed due to Covid restrictions. We are planning to host a 2nd customer/supplier day in FY21 to raise awareness of MDS. Although all high-risk suppliers have been introduced to Slave-Free Alliance there are a number that have not joined the SFA or an equivalent scheme. Target is to have 75% of them confirmed as members of either SFA or equivalent scheme by year end.

Ensure site and BU managers understand where their workforce may be at higher risk of MDS and are aware of BW5 policies and procedures around this. Providing supportive tools where appropriate.

Victim and Survivor Support

Our target actions for the coming year and beyond are aligned to this strategy:
We will expand our support for 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. We will expand our support to work with experienced partners to provide an appropriate, survivor centered, remediation offering.

2021-22 – Target
Develop a network of champions who can support the wider group strategy on MDS and embed knowledge and awareness locally and let colleagues know what support is available, as well as helping to broaden our opportunities to directly support the communities we serve and potential victims as eyes and ears on the ground.

Launch pilot abolition group which will provide support and a platform for community groups to support survivors.

Review our MDS Policy and introduce support for victims and survivors identified in our employment or supply chain. 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 anti-slavery and human trafficking statement of Biffa, including Biffa Waste Services Limited, Biffa Municipal Limited, Biffa Leicester Limited, Biffa West Sussex Limited and UK Waste Management Limited.

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

Michael Topham
Chief Executive Officer
26 September 2021