

Modern Slavery and Anti Human Trafficking Statement

FY 2025



A foreword from our Chief Executive Officer

At Biffa, we stand firmly against Modern Slavery and Human Trafficking — there is absolutely no place for it in our operations or supply chains.

We're not just committed to compliance; we're determined to lead the way in our industry by championing anti-slavery practices. Guided by our three-pronged strategy — Raising Awareness, Strengthening Our Response, and Supporting Victims and Survivors — we continue to evolve and enhance our approach.

This year, we've made meaningful strides forward, reinforcing our dedication to tackling this global issue head-on.



Michael Topham, CEO

2025 Highlights

- We commissioned **Slave Free Alliance (SFA)** to complete audits of an acquired business, Hamilton Waste and Recycling, to benchmark their practices and to support our integration of that business to Biffa practices.
- SFA also **conducted an audit on one of our key suppliers** to assess their current understanding of and response to the risk of modern slavery (MS) and labour exploitation and how we could work better together.
- We **participated in a customer MS Audit** and the work we do in this area helped us retain this contract.
- We **updated the MS area of our company intranet**, ensuring all employees have access to our latest resources on MS.
- We **updated our Welcome and Induction booklets** for new starters, ensuring all colleagues have an awareness of the risks of MS at the earliest opportunity
- We **participated as speakers at the Supply Chain Sustainability School Sustainable Procurement – Virtual Conference**, sharing our experiences, practices and challenges in managing MS in our supply chain.



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Targets for 2025-26

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

i. Raising Awareness	2025-26 Target
✓ Review of our strategy and policy ensuring we are aligned with best practice and the evolving nature of the risks.	
✓ Update our Toolbox Talk and e-learning which has been rolled out as part of our internal awareness raising campaigns, along with learning materials, ensuring all information shared is up to date, recognising changing risks and aligned to our strategic objectives around MS.	
✓ Formal review of Smart Solutions our labour provider by our internal audit team.	
✓ SFA Assessment of recently acquired Biffa Treatment Services business.	
ii. Strengthening our Response	2025-26 Target
✓ Refresh of our training and awareness raising resources, ensuring key stakeholders have refresher training on the risks and how to spot signs.	
✓ Roll out our new Supplier Code of Conduct, into onboarding, tendering and contracting processes, which sets out the expectations of all our suppliers within Biffa.	
✓ 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.	
✓ Enhancing of due diligence on supply chain to include monitoring of Politically Exposed Persons, Sanctions and adverse media.	
✓ Introduction of company-wide risk register and internal cross departmental working party to highlight business risks and share best practice.	
iii. Victim and Survivor Support	2025-26 Target
✓ Where possible collaborate with labour partners and enterprises, to support employment and other survivor schemes.	

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 28th, 2025.

1. Introduction

Modern Slavery remains a serious and growing global issue, exacerbated by increasing migration and complex supply chains.

As a leading UK waste management and recycling business, Biffa recognises the heightened risk our sector faces from exploitation and criminal activity. That's why we are unwavering in our zero-tolerance approach to all forms of Modern Slavery — including slavery, servitude, forced labour, and human trafficking — across our operations and supply chains.

We are committed to fostering a culture of vigilance, transparency, and accountability. All employees are encouraged and expected to speak up and report any concerns through our established reporting channels, with the assurance that every report will be taken seriously and acted upon.

Our stance against Modern Slavery is not just a policy — it's embedded in our vision, strategy, and purpose. Through our sustainability strategy, Resourceful, Responsible, launched in 2020, we continue to drive positive change. One of its core pillars, Caring for Our People and Supporting Our Communities, reflects our dedication to protecting human rights and promoting ethical practices throughout our business.

For the purposes of this statement, references to 'Biffa', 'we', or 'our' include Biffa Topco Limited and all its subsidiary companies.



2. Organisational structure and supply chains

With over a century of experience, Biffa has evolved from a traditional waste collection service into a purpose-driven leader in sustainable waste management.

Since 1912, we've been helping the UK rethink waste — transforming it into a resource and reducing its environmental impact. Headquartered in High Wycombe, we now employ around 11,000 people across the group, united by our purpose: to lead the way in creating a sustainable future for the UK; changing the way people think about waste.

As part of our operations, we work with a wide network of external suppliers — from labour providers to materials and service partners — the majority of whom are UK-based. We uphold the Code of Ethics of the Chartered Institute of Procurement & Supply and require all suppliers to comply with relevant legislation and international standards — including those related to child and forced labour, health and safety, non-discrimination, employment law, human rights, anti-bribery, and corruption.

At Biffa, our vision to lead the way in sustainable waste management in the UK, and our Supply Chain is critical to the successful delivery. With a spend of over £1 billion per annum on goods and services, responsible procurement plays a vital role in our business.

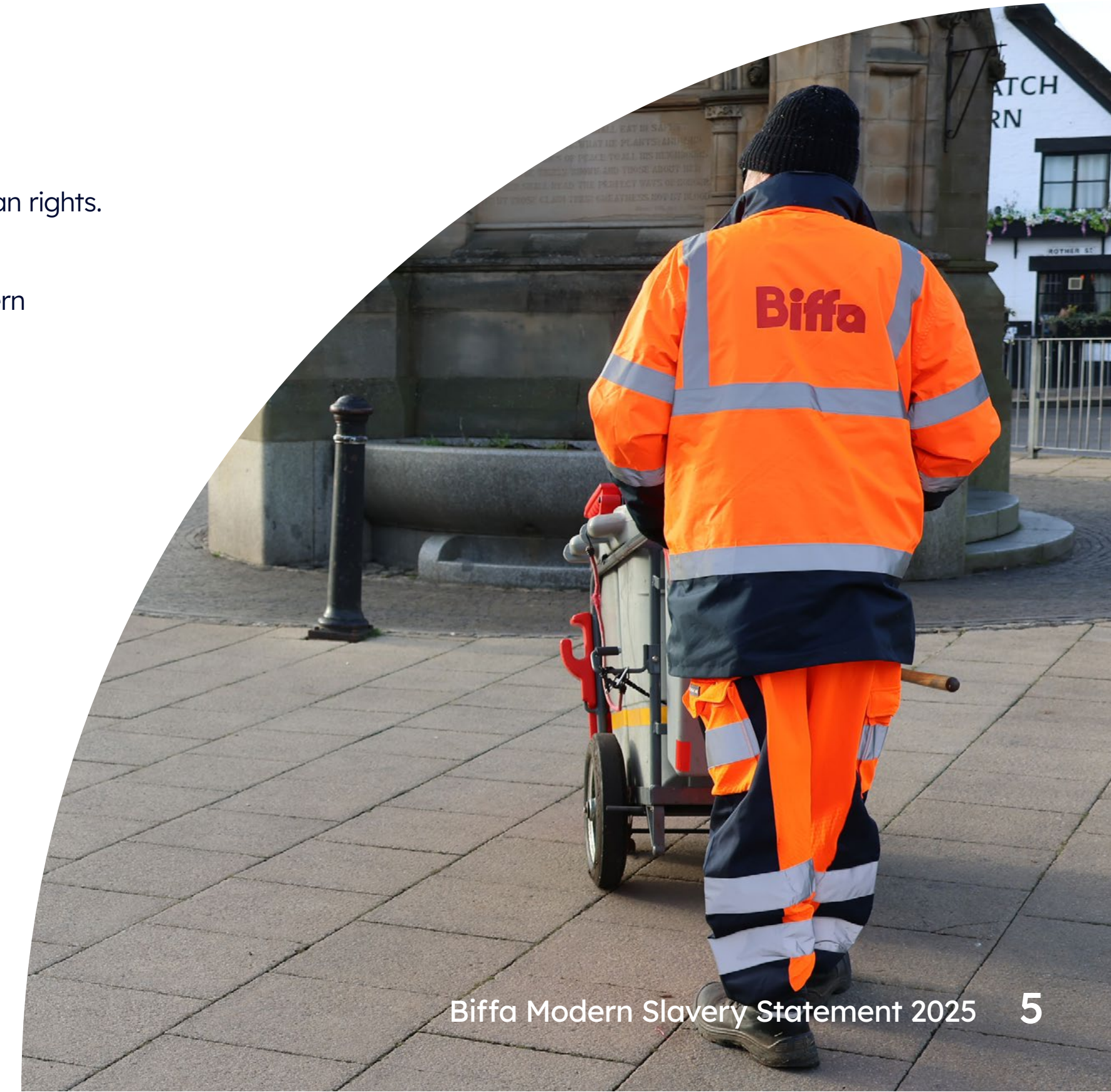
Biffa's Procurement Team work in partnership with our suppliers to strive for innovation and achieve high standards of responsible sourcing, sustainability and human rights. We aim to continue to stamp out modern slavery and are guided by our Biffa Procurement Policies and our new Supplier Code of Conduct.

To become an approved supplier of Biffa, you need to meet our ethical, environmental and health and safety standards. Suppliers are required to complete a modern slavery compliance questionnaire and agree to the Supplier Code of Conduct. All data is auditable via digitalised supplier records and work closely with Slave Free Alliance to regularly review supply chain risks and our process of reporting.

We recognise that some areas of our supply chain, particularly those involving temporary labour through managed service and agency arrangements, carry a higher risk of exploitation. That's why we take a proactive, risk-based approach to managing these relationships.

Over the past year, we've continued our focus on Modern Slavery across our operations and supply chain. Our partnership with Smart Solutions Group, our managed service provider, is a key part of this. We maintain regular, transparent dialogue through on-site Account Managers and strategic meetings. Smart Solutions' membership in organisations such as Stronger Together, Slave-Free Alliance, the Gangmasters and Labour Abuse Authority, and the Association of Labour Providers reinforces our shared commitment to ethical labour practices and continuous improvement.

This work is a vital part of our broader sustainability strategy, Resourceful, Responsible, and reflects our core pillar of Caring for Our People and Supporting Our Communities. We remain committed to building a business — and a supply chain — where dignity, fairness, and respect are non-negotiable.



3. Raising awareness

We continue to expand our knowledge and network of best practice attending various forums and events on the issue including attendance at SFA seminars and Scotland Against Modern Slavery (SAMS) forum meetings and participating in the Supply Chain Sustainability School Sustainable Procurement – Virtual Conference.

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 as well as sharing our experiences and exchanging best practice. We look forward to continuing our work with them.

Slave Free Alliance and Hope for Justice

We have continued our membership of the SFA, 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, the SFA and other like-minded organisations.



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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.

→ Biffa Procurement Policy and our new Supplier Code of Conduct

Biffa insists on ethical standards from all 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.

→ Biffa Code of Conduct

Sets out the legal, ethical and regulatory standards that apply to everyone in our business including a dedicated MS principle.

→ 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 both the Chief People Officer 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, 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.

Biffa 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

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 a video and resources from Stronger Together made available in multiple languages to ensure awareness is raised around MS, particularly forced labour

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.

A 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.

Modern Slavery has a dedicated page on our internal intranet, providing a single place for all our resources to support colleagues in understanding the risks, our approach and how to raise concerns.

We run communication and awareness raising campaigns, on our intranet, through our employee app and social media channels, in particular around Anti-Slavery day, including briefing all employees on the risks of MS, spotting the signs of the different types of modern slavery and how to report concerns.

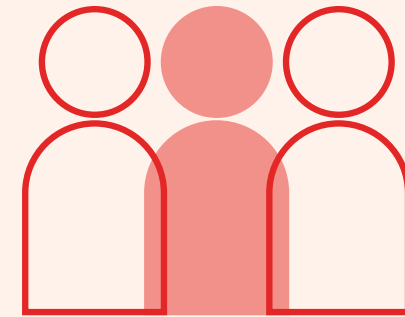
Regular review meetings are held with our managed service and agency workers provider



7. Progress report 2024-25

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 continue to make to raise awareness of human trafficking and MS.

We will continue to champion internal and external campaigns promoting awareness of this important global issue across our business, supply chains and wider industry.

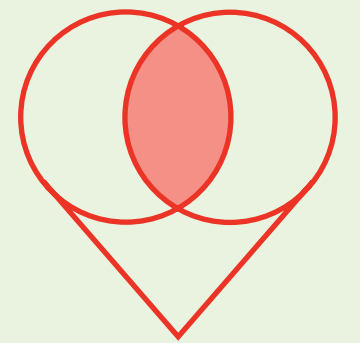
ii. Strengthening our Response to the Threat



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

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 are applying them vigilantly and consistently.

iii. Victim and Survivor Support



We will support any employee 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 centred, remediation offering.

7.1 Progress report 2024-25

i. Raising Awareness	2024-25 Progress
<div><div><div>✓</div></div><div>Continued to ensure 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 with MS risk included in our onboarding materials for all new starters.</div></div>	
<div><div><div>✓</div></div><div>Participated as speakers at the Supply Chain Sustainability School Sustainable Procurement – Virtual Conference, sharing our experiences, practices and challenges in managing MS in our supply chain.</div></div>	
ii. Strengthening our Response	2024-25 Progress
<div><div><div>✓</div></div><div>Slave Free Alliance (SFA) assessment and audits were completed on an acquired business, Hamilton’s and on our PPE supplier, to understand their current practices on MS to explore what more we can do. Reports were reviewed and actions established including appropriate training / awareness updates and supply chain review activities.</div></div>	
<div><div><div>✓</div></div><div>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.</div></div>	
<div><div><div>✓</div></div><div>The migration to our new Finance & Procurement System has provided a valuable opportunity to enhance and future-proof our supply chain controls. By reassessing supplier data, streamlining compliance checks, and integrating more robust monitoring capabilities, we’ve been able to reinforce our standards around ethical sourcing, transparency, and risk mitigation. This transition has not only improved operational efficiency but also deepened our visibility into supplier practices—allowing us to act with greater confidence and accountability across our supply chain, enhancing and improving supplier management and onboarding processes.</div></div>	
<div><div><div>✓</div></div><div>Created and implemented supply chain risk mapping process to highlight high risk categories within the supply chain for MS.</div></div>	
<div><div><div>✓</div></div><div>Standardised the competitive tendering process to include minimum 10% Environmental, Social and Governance (ESG) score, and mandated compliance to Modern Slavery.</div></div>	
<div><div><div>✓</div></div><div>Set a target to tender 80% of our addressable spend over the next 2 years to ensure our supply chain is not just value for money but also compliant against MS and other risks.</div></div>	
iii. Victim and Survivor Support	2024-25 Progress
<div><div><div>✓</div></div><div>We have our victim support guidelines in place and continue to work with our labour providers to support employment and other survivor schemes.</div></div>	

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 March 2025.

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



Michael Topham, CEO
September 2025

Biffa



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