

Bristol Waste Company Modern Slavery and Human Trafficking Statement

Year Ending March 2021

Purpose

This statement sets out Bristol Waste Company's actions to understand potential modern slavery risks related to its business and the steps taken to ensure there is no slavery or human trafficking, forced labour or exploitation, in its own business or its supply chain in accordance with the Modern Slavery Act 2015.

Background

The Company issued a statement on modern slavery and human trafficking in March 2019 for the business year ending March 2020. This statement provides an update for the business year ending March 2021, reflecting the steps the Company will take to review the to review our procedures and operations.

Structure and Business

Bristol Waste is a Teckel company wholly owned by Bristol City Council. It operates the waste function for and on behalf of the Council with responsibility recycling and refuse collection; household recycling and reuse centres; street cleansing services and the treatment of the waste collected.

The sector in which the Company operates is attractive to perpetrators of slavery and human trafficking and stopping the practice as an important part of our corporate responsibility.

Supply Chains

Bristol Waste purchases goods and services suitable for the industry sector, such as; waste treatment services, fleet services, plant, industrial equipment, fuel, consumables and sourced labour. Whilst the risk of slavery and human trafficking in most areas is low, the Company remains vigilant and will take all steps available to manage the risks presented.

High-risk activities

A potential area of high risk for slavery or human trafficking could be when recycling material is exported for processing in non UK locations. Some waste is exported to the EU and further afield with physical location makes it difficult to monitor. To mitigate this, the Company only use sites which are approved by our own regulating authority and hold the relevant licences in the relevant country.

Where the Company has contracts to export material, steps are taken to ensure that businesses it works with, are also committed to ensuring their supply chains are slavery and trafficking free and publish a modern slavery and human trafficking statement.

Responsibility

Responsibility for the company's anti-slavery initiatives are as follows:

Policies and workforce data: Human Resources will continue to ensure that appropriate HR policies are in place and reviewed on a regular basis. And review data including reports to identify multiple duplicate addresses which is a sign of a potential problem.

Partner organisations: such as recruitment agencies, will be asked for their statements and information on the policies and practices they operate to combat the problem.

Risk assessments: will be undertaken by the relevant service area where there is deemed to be a risk.

Briefing & awareness: will take place again through articles briefings cascaded to all staff and information on the Company intranet.

Investigations/due diligence: employees will be reminded again that, any concerns they have should be raised with Human Resources in the first instance. Investigations will then take place in accordance with Company guidance and procedure.

Relevant policies

Bristol Waste operates the following policies that describe its approach to the identification of modern slavery risks, and steps taken to prevent slavery and human trafficking in its operations:

Recruitment: the recruitment policy and processes is designed to select candidates on merit and ensure that all prospective employees are legally entitled to work in the UK.

People management: once in employment. the company's HR policies and processes are in place to help safeguard employees from abuse and coercion.

Whistleblowing policy: the company encourages all workers, customers and other business partners to report any concerns. The Bristol Holdings organisation whistleblowing policy and procedure will then be used to make it easy for employees to make disclosures, without fear of victimisation.

Employee Code of Conduct: the Company's code clearly sets out the actions and behaviours expected of employees. Bristol Waste strives to maintain the highest standards of conduct at all times and perpetration of and/or failure to report slavery or human trafficking would constitute a breach of the code for which disciplinary action will be taken.

Procurement policy: the company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate 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.

Expectations of Suppliers: Bristol Waste Company is committed to ensuring its suppliers adhere to the highest ethical and environmental standards. Suppliers are required to demonstrate during any tender process that they provide safe working conditions, they are committed to the environment and they are committed to their corporate responsibility.

Due diligence

Bristol Waste Company is committed to zero tolerance of slavery and human trafficking in its supply chains.

The organisation's due diligence and reviews include:

- **Supplier assessment:** potential suppliers are assessed at tender stage as part of the evaluation process.
- **Terms and Conditions:** the use of standard terms with all contracted suppliers requiring suppliers to comply with the Modern Slavery Act
- Any exporter of recyclable materials must be committed to ensuring their supply chains are slavery free and have published a modern slavery and human trafficking statement
- **Agency / Temporary Workers:** future tendered procurement processes will require all suppliers to state compliance with the Act

Awareness-raising and briefing

Bristol Waste will again heighten employee awareness of the Modern Slavery and People Trafficking Act 2015 and remind all employees of the arrangements for reporting suspected or discovered cases of slavery or human trafficking.

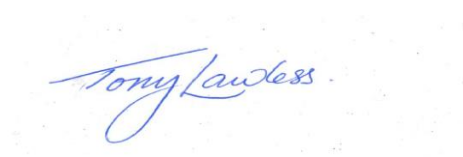
Modern slavery notices/briefings will be cascaded to employees and posted on our website and noticeboards. These will explain:

- the basic principles of the Modern Slavery Act 2015;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what employees can do if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within Bristol Waste Company;
- what external help is available, for example through the Modern Slavery Helpline, Gang-masters and Labour Abuse Authority and "Stronger Together" initiative.

This statement is made in accordance with S54(1) Modern Slavery Act 2015 and constitutes Bristol Waste Company's Slavery and Human Trafficking statement for the business year ending March 2021.

Board approval

This statement was approved by Bristol Waste Company Directors, and the Board of Directors will review and update this annually.



Tony Lawless

Managing Director

Date: 23RD November 2020