

## MODERN SLAVERY STATEMENT 2022

### 1. Introduction

- 1.1 This statement is made having regard to Section 54 of the UK Modern Slavery Act 2015 (the "Act"). It sets out the steps taken by the East London Waste Authority (the Authority). The Authority, as a public authority, is not regulated by the Act although its contractor and joint venture company ELWA Limited, (the Company) is bound by the Act because of its annual turnover. This statement sets out the steps the Company took during the financial year ending 31 March 2022 to prevent modern slavery and or human trafficking in our own operations and supply chains, and notes the activity of Authority officers.
- 1.2 Modern Slavery is a term used to encapsulate offences in the Modern Slavery Act 2015 and takes various forms such as slavery, servitude, forced labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Businesses must be alert to the risks of modern slavery, not only ensuring there are appropriate working conditions within their own business, but also satisfying themselves that there is no modern slavery within their supply chains, plus taking appropriate action where necessary.
- 1.3 The Company takes a zero-tolerance stance on modern slavery. Ensuring the health, safety and wellbeing of its colleagues and Service Provider is a top priority and is at the core of its approach. The Company Board seeks to continue to re-enforce this throughout the Company's operations and supply chains. Should anyone working on behalf of the Company, supplier or Service Provider act to the contrary, the Company's Board indicates it will not hesitate to take appropriate measures and Authority officers will do the same.
- 1.4 The Company has no direct employees and delivers its contractual requirements through other organisations and suppliers. The Company's Board requires that these organisations have modern slavery policies, which discourage and deter modern slavery within their businesses. This policy reflects the Company's commitment to acting ethically and with integrity in all of its business relationships. However, the Company's Board acknowledges that it must remain vigilant to the risks and ensure that its suppliers and Service Providers understand and play their part in ensuring that modern slavery and human trafficking does not occur in the Company's operations or supply chains; and the Authority does the same.
- 1.5 Where necessary, the Authority and the Company will look to further strengthen controls throughout the Company's business and wider supply chain and will seek to develop the Company's policies, in line with best practice and continuous improvement principles.

### 2. Our Organisation

- 2.1 On 23 December 2002, the East London Waste Authority (the "Authority") entered into a 25-year PFI contract with the Company for the provision of waste management

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services for municipal waste arising within the East London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge.

- 2.2 The Boroughs have a combined population of over one million people living in more than 400,000 households. Approximately 450,000 tonnes of waste are delivered to the Company and its Operator Renewi UK Services Limited ("Renewi", part of Renewi plc) by the Constituent Councils and residents each year for disposal. As part of the contract, over £100 million has been invested in new and improved facilities, new ways to treat and transport waste and better communications with the Authority's residents, thereby providing the infrastructure to significantly increase recycling and reduce the amount of waste sent to landfill.
- 2.3 The Company is owned in partnership by JLEN Environmental Assets Group Limited and Renewi UK Services Limited, with the East London Waste Authority holding minority voting rights.
- 2.4 The Company appointed Renewi under an Operating Contract to provide the operational services as detailed in the contract with the Authority, in a manner which is compliant with all legislation. Under the Operating Contract Renewi delivers some services directly and procures other goods and services from a range of suppliers. This means that ELWA Limited's compliance with the Modern Slavery Act 2015 is delivered principally by Renewi through the Operating Contract.
- 2.5 The Authority has a director on the Company's Board, and the Board ensures in turn that its Operator ensures that a safe and compliant workplace is provided for all workers on each of the sites under the Company's control.
- 2.6 Renewi plc subscribes to the ten principles of the UN Global Compact, an international initiative by the United Nations to promote improved human rights, working conditions, environmental protection, and anti-corruption. Businesses, including Renewi plc, that subscribe to these ten principles commit to the following:

#### Human Rights

- Principle 1: support and respect the protection of internationally proclaimed human rights
- Principle 2: make sure that they are not complicit in human rights abuses

#### Labour

- Principle 3: uphold the freedom of association and the effective recognition of the right to collective bargaining
- Principle 4: promote the elimination of all forms of forced and compulsory labour
- Principle 5: promote the effective abolition of child labour
- Principle 6: promote the elimination of discrimination in respect of employment and occupation

#### Environment

- Principle 7: support a precautionary approach to environmental challenges

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- Principle 8: undertake initiatives to promote greater environmental responsibility
  - Principle 9: encourage the development and diffusion of environmentally friendly technologies

### Anti-Corruption

- Principle 10: work against corruption in all its forms, including extortion and bribery
- 2.7 In addition, Renewi recognises the 8th UN Sustainable Development Goal (SDG 8); to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all. This includes the taking of immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.
- 2.8 These core values and principles form the basis of Renewi' plc's Code of Conduct, which applies to all employees, agency workers, interns and individuals working for the Company on a contract basis. The Code of Conduct outlines the conduct expected of individuals working for Renewi companies but also what these individuals can expect from Renewi plc.

### **3. Annual Review and Steps Taken**

- 3.1 This Statement will be reviewed and updated annually by the Authority following the Company's annual review of its statement that was last approved on 03 December 2021.
- 3.2 The Company published its first Modern Slavery Statement in July 2017. Since then, on the Company's behalf, Renewi has focused on strengthening the approach to the prevention of modern slavery within the Renewi business and supply chains, particularly in the areas of greatest risk.

### **Steps taken by Renewi in 2021/22**

- The main area of focus remained that of the management of temporary labour, a known area of higher risk for the waste sector.
- Following on from previous campaigns, Anti-Slavery Day was marked on 18 October 2021 with another awareness campaign in the UK, including posters and internal announcements.
- Renewi continued to roll out its approach to anti-slavery into its Benelux (Belgium, Netherlands and Luxembourg) businesses, including the 'Source to Pay' procurement system which helps improve the control and monitoring of supply chains.
- Modern Slavery "Toolbox Talks" were delivered to site staff in the UK.

### **Planned steps taken and to be taken by Renewi in 2022/23**

- Efforts will continue to further unify practices in the UK and Benelux, with the ambition of eventually having one single Group-wide approach to Modern Slavery.
- There was another Anti-Slavery awareness campaign held during October 2022.

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- It will be determined whether to introduce the Renewi 'Source to Pay' procurement system to their UK businesses or integrate processes as part of a broader digitisation programme.
  - In 2022/23 Renewi intends to introduce a Modern Slavery Policy.
  - In 2022/23 Renewi will conduct a series of deep dive audits with its suppliers of temporary labour.

#### **4. Our business and supply chains**

- 4.1 The Authority recognises it has a significant role to play in combatting modern slavery in the services it commissions directly and indirectly.
- 4.2 The ELWA Limited Board of Directors has accepted collective responsibility for the prevention of modern slavery and expects its contractors to ensure that a safe and compliant workplace is provided for all workers on each of the Company's sites, free from the risks of modern slavery.
- 4.3 The Company's Operator (i.e. principal contractor), Renewi, regularly uses agency labour procured through third party providers to treat waste delivered to the Company for recycling, diversion from landfill and landfilling. All the Company's suppliers are UK or EU companies.
- 4.4 The Authority and the Company have concluded that the greatest modern slavery risks lie within our supply chains and that we, in partnership with Renewi, would benefit from a higher degree of oversight in relation to our indirect suppliers and contractors, where the modern slavery risk is deemed higher. Renewi is committed to supporting the Authority and the Company in identifying such potential risks and responding appropriately and this will continue to be an area of focus for Authority officers in the coming year when carrying out inspections at Renewi facilities and Duty of Care audits at supplier facilities.
- 4.5 All suppliers of labour, goods and services to the Company, via Renewi, must comply with 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. Where required by law, suppliers and Service Providers must produce an annual Modern Slavery Statement pursuant to section 54(1) of the Modern Slavery Act 2015.
- 4.6 Renewi takes action to ensure that suppliers comply with Renewi's policies by screening significant suppliers on sustainability issues, including human rights and labour standards. To raise awareness of modern slavery and trafficking and of relevant policies and procedures, Renewi has developed an approach to give more in-depth training to staff who are most likely to come into contact with modern slavery.
- 4.7 The majority of Renewi's employees are engaged on permanent contracts. However, the Company and Renewi recognise the risks to short-term temporary staff. Renewi operates a preferred supplier list for the provision of direct temporary labour, contract workers and the recruitment of new employees and only works with recruitment agencies that share its stance against all forms of modern slavery. Any instances of modern slavery, Health, Safety and Environmental breaches or incidents by or involving service providers are reported to Renewi's Board and appropriate action is taken.

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4.8 Should any indicators of modern slavery be identified by the Company or Renewi, they would work with their suppliers to investigate and where appropriate, report to the necessary authorities. Should the Company or Operator consider a supplier or service provider has failed to comply with any of the above, it will undertake an automatic review of the supplier or service provider's contract, resulting in appropriate action being taken for any breach, up to immediate termination of the contract. Similarly, should the Authority identify any indicators of modern slavery, it will ask the Company and/or Renewi as relevant to take appropriate action and report back.

## **5. Staff Engagement**

5.1 The Authority staff (and those of the Constituent Councils when undertaking contract monitoring work for the Authority) have had training about how to identify modern slavery. The Authority continues to review how to best co-ordinate modern slavery awareness training in the future to minimise the risk of such activity continuing undetected.

5.2 The Company, ELWA Limited, does not employ any staff directly. However, ensuring the health, safety and wellbeing of its colleagues is crucial to the Company's success and this responsibility is taken very seriously. The health, safety, wellbeing and engagement of its people is a top priority for Renewi in particular, which has noted this starts with making sure its colleagues go home safely every day.

5.3 All Renewi's staff must adhere to Renewi's Code of Conduct. Renewi has assured the Authority that it complies with its obligations under the Working Time Regulations and that all its staff are treated fairly and equally, and are paid at least the national minimum wage.

5.4 All sites are overseen by Renewi, which employs competent management teams to ensure optimum control of the work environment.

## **6. Approval & Review**

6.1 This Modern Slavery Statement has been approved by the Authority at its General Meeting, 25 November 2022. The Authority will review and update it annually.

**Signed**

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**Chair of the East London Waste Authority**

**25 November 2022**