



Modern Slavery & Human Trafficking Statement

Purpose

This statement sets out Urbaser Limited's (the Company) 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 has been prepared in accordance with the requirements of the Modern Slavery Act 2015.

As a sustainable company with many suppliers providing us with products and services, the Company recognises its responsibility to take a robust approach to respect and observe human rights, including those against slavery and human trafficking.

The Company is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that there is no modern slavery or human trafficking in its supply chain or any part of its business. Our Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains

Scope of application

This Policy is applicable to all employees, managers and members of the governing bodies of URBASER S.A., its subsidiaries and holdings/joint ventures in which URBASER is the majority shareholder / partner or where control is held by URBASER's management ("URBASER" or "the Company"). It is the responsibility of all URBASER employees to act professionally and protect the Company's reputation.

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Organisational structure

Urbaser is a global provider of environmental services and the Company is one of the main operators in the UK environmental sector and a leader in waste management. The Company is part of the Urbaser Group, and its parent company, Urbaser S.A.U, headquartered in Madrid, Spain.

Relevant policies

The Company operates the following policies 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:

- **Code of conduct:** The Company's code makes clear to employees the actions and behaviours expected of them when representing the organisation. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Corporate Social Responsibility Policy (CSR):** CSR is understood as the sustainable undertaking of the Company when dealing with its main stakeholders by incorporating ethics, good government, environmental and social criteria into its business model.
- **Supplier's Code of Ethics:** reflects the expectation of the Company towards its suppliers, contractors and collaborators to carry out their activities respecting at all times and in all their activities and locations internationally recognised and fundamental human rights.

- **Recruitment Selection Policy:** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, we have adopted the following due diligence procedures:

- We require from our suppliers, before appointing them, detailed information of any plans in place in the event labour right concerns are identified in their supply chain
- With regards to national or international supply chains, our contact point is preferably with a UK company or branch and we expect these entities to have suitable slavery and human trafficking policies and processes

We have systems in place to encourage the reporting of concerns and the protection of whistle blowers.

Suppliers

Any supplier found to be demonstrating unacceptable practices will be investigated and provided with guidance regarding immediate required improvements. If no improvement is implemented or they indicate an unwillingness to cease the unacceptable practices they will be reported to the appropriate authorities and ultimately trading with the supplier will cease.

Process to Oppose Trafficking and Slavery

The Company is committed to providing applicable staff with a salary that as a minimum, meets the National Living Wage. In addition, the Company ensures that all staff have provided their National Insurance Number or Work Visa if they are not British Nationals, prior to commencement of their employment and performs the necessary checks to determine an individual's eligibility to work in the UK.

Risk assessment

Effective risk and opportunity management is key to all of our business activities and plays an important role in implementing strategic targets and achieving sustainable and profitable growth. The group Corporate Social Responsibility team is performing a human rights risk evaluation from a corporate perspective on a country by country basis and the conclusion of this evaluation in the UK was a very low risk level for the activities performed by the Company. This risk evaluation will be reviewed and updated on an annual basis to further assess the position and ensure that the objectives of our policies are being met.

Performance indicators

All employees, business partners, customers or other stakeholders wishing to report possible violations of national regulations or internal guidelines can make their report to the Compliance Officer via the Communication and Reporting Channel (compliance@urbaser.co.uk), openly or anonymously. All honest reports will be treated confidentially and will not result in any reprisals.

Learning

We invest in educating our employees to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our learning programmes, employees are encouraged to identify and report any potential breaches of the Company's policies. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicating these from our business and supply chains.

Sign-off

This statement is made in accordance with section 54(1) of the Modern Slavery and Human Trafficking Act 2015 and constitutes the Company's statement for the financial year ending 31st December 2019



Javier Peiro
Managing Director

Cheltenham, 20th August 2019