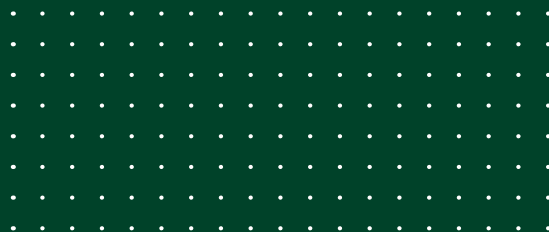


Modern Slavery Statement 2023



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Paco Hevia
Chief Executive Officer,
Thalia Waste Management

Modern slavery includes the control, coercion, and exploitation of vulnerable individuals for economic gain. The International Labour Organization estimated in 2021 that close to **50 million** people are trapped in forced labour or a forced marriage on any given day.

At Thalia we do not tolerate any form of slavery, abuse, or exploitation. Thalia's Board of Directors is determined and committed to help eradicate human trafficking and modern slavery in all of its forms and we want to make sure our people feel safe in an inclusive environment.

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About Thalia Waste Management

At Thalia, we deliver a range of environmental and waste management services. This includes waste collection, operation of household waste recycling centres, and waste treatment, including gasification and energy from waste facilities. We have many years of experience working with local authorities, communities, and businesses of all sizes across the UK.

Our experienced waste teams help local authorities, businesses, and the communities we serve meet sustainability and environmental challenges. We provide cost-effective, comprehensive waste and resource management solutions while employing over **550 people across the UK.**

Our first business focus is on Environmental, Social, and Governance (or ESG). We are committed to acting ethically, and with integrity in our business activities, and relationships. We also implement and apply effective systems and controls to make sure modern slavery does not happen anywhere within Thalia or across our supply chain.

At Thalia, we take a zero-tolerance approach to non-compliance with the Modern Slavery Act.

Thalia's Governance

Thalia Waste Management's Executive Team has responsibility for Thalia's approach to modern slavery.

Together, we've created an action plan to reduce the risk of modern slavery occurring in Thalia and our supply chain. We have also set up a modern slavery working group to review our approach to modern slavery, to co-ordinate the delivery of our plan, and our annual statement.

The group involves representatives from Thalia's Procurement, People Services, Business Improvement, and Legal functions.

Our policies

Thalia's commitments are supported by our Anti-Slavery and Human Trafficking Policy here: thalia.co.uk/thalia-policies

Our modern slavery policy sets out:

- What modern slavery is;
- How to identify potential instances;
- How we prevent modern-day slavery;
- How we detect this, and
- How we report.

Our commitment to acting ethically and with integrity is supported by other policies guiding our people's behaviour, our recruitment process, our sourcing of goods and services, and our relationships.

These include:

- Business Ethics Policy
- Integrated Health Safety Environment and Quality Policy Statement and Management System Manual
- Whistleblowing Policy
- Procurement and Supply Chain Policy
- Recruitment & Selection Policy
- Inclusion Policy
- Employee Assistance programme
- Dignity at Work Policy

All our new people have access to all Thalia policies. Information on these is also included as part of our people and supply chain onboarding process.

Our Supply Chain and Supply Chain Risks

Thalia aims to build and maintain long-term sustainable relationships across its supply chain and to facilitate this the procurement of supplies and services is managed by our specialist Procurement team.

During 2023, we worked hard to achieve greater visibility of all tiers of our supply chain. Thalia's supply chain is approximately **800 suppliers and includes suppliers of:**

- Construction services
- Plant, vehicles, and equipment
- Subcontracted and miscellaneous services
- Contingent labour
- Materials and manufactured goods

As part of the supply chain process, we have several systems which:

- Evaluate new suppliers as part of the onboarding process
- Identify and assess potential risk areas in our supply chain, and
- Monitor potential risk areas within our supply chain

In 2023, to increase the integrity of procurement processes, we implemented a new digital procurement platform to help with the management of our supply chain. This platform is used for the identification and prequalification of suppliers to common industry standards. The prequalification process includes questions specifically related to modern slavery. The suppliers are **assessed for compliance with the following criteria:**

- No forced labour or human trafficking is practiced, and employment is freely chosen
- Working conditions are safe and hygienic
- Working hours are not excessive
- A fair wage is paid
- No child will be exploited
- No harsh, cruel, or degrading practices are allowed
- No discrimination is practised

Thalia undertakes further periodic investigation of suppliers considered to be of higher risk. The following procurement categories are suppliers that Thalia has identified as being of **higher risk of modern slavery occurring:**

- Labour market (including Temporary Staff and Recruitment)
- Personal Protective Equipment, Consumables and Products sourced outside of the UK/EU
- Cleaning services
- Waste disposal
- Localised subcontract services

We also conduct regular risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that focus can be put on these areas. This includes consideration of sourcing which may result in engagement of lower tier supply chains located in countries where the risk of modern slavery is more prevalent.

We require our suppliers to document the steps they take to tackle modern slavery and, on request, to provide a copy of their modern slavery statement and information to enable Thalia to assess the supplier's potential exposure to incidents of modern slavery, and the measures the supplier has put in place to ensure that risk is being correctly managed and mitigated, including providing a report detailing policies and procedures implemented, due diligence undertaken, risk areas identified, training provided and consequences for third parties of non-compliance.

Thalia also introduced provisions within our contracts with our supply chain that require our suppliers to positively confirm their adherence to our Anti-Slavery and Human Trafficking Policy, and allow Thalia to audit their activities and (where practicable) relationships, both routinely and if we have concerns about the suppliers compliance with any of our policies.

Our recruitment and training

We undertake pre-employment screening, including identity checks and confirmation of entitlement to work in the UK for all our people. These checks include regular ongoing review of bank accounts, next of kin, and home address for duplications, which are potential indicators of modern slavery. Where duplications are identified these are managed by Thalia's People Services team.

In 2023, Thalia also implemented mandatory online (or e-learning) Modern Slavery training for all our people. The training explains what modern slavery is, who's at risk, how to spot the signs and how to report it. This training was supported by Ferrovia's compliance course which included training on Ferrovia's supplier codes of ethics policy, due diligence for third-party integrity, and policy of the ethical channel, and for managing queries, complaints, and reports.

Across Thalia, our people can raise concerns by:

- Contacting their People Manager or an appropriate manager
- Contacting Thalia's Whistleblowing Helpline
- Using Ferrovia's Ethical Channel

As part of our onboarding process, all new recruits receive a formal induction, where they are given access to Thalia's Anti-Slavery and Human Trafficking Policy and Whistleblowing Policy and are required to complete an online course on modern slavery.



Thalia's e-learning platform

Thalia's Key Performance Indicators

Thalia Waste Management continues to review the measures implemented to prevent and combat modern slavery, such as training, supplier due diligence, and audits. Our main KPIs for ensuring the effectiveness of **reducing the risk of slavery and human trafficking include:**

- Employee completion of mandatory modern slavery training
- Percentage of suppliers using our procurement portal and having fully and satisfactorily completed the pre-qualification assessment
- Targeted supply chain audits
- Actual and potential incidents raised through any of the channels provided
- Screening for duplications in employee data (next of kin, bank details, bank addresses) as a potential indicator of modern slavery

Thalia 2024 priorities

During 2024, Thalia will:

- Hold quarterly Modern Slavery working group sessions to discuss our action plan and progress of key priorities
- Continue to raise awareness of modern slavery to our people and supply chain and Thalia's whistleblowing process
- Expand Thalia's existing supplier checks and improve supplier compliance with the onboarding process
- When letting new contracts require its subcontractors to adopt a whistle-blowing policy that enables their people to blow the whistle on any suspected examples of modern slavery
- Ensure quality assurance safeguards are in place to identify any potential infringement of its Modern Slavery Policy



This statement is made under section 54(1) of the Modern Slavery Act 2015 and constitutes Thalia's slavery and human trafficking statement for the financial year ending 31 December 2023.

This statement applies to Thalia Waste Management Limited and its subsidiary companies. This statement has also been approved by the board of directors of Thalia WB ODC Limited on today's date.

A handwritten signature in black ink, appearing to read 'Paco Hevia', written over a horizontal line.

Paco Hevia

Chief Executive Officer

28th March 2024

**At Thalia Waste Management,
we see waste differently.**

Waste isn't just rubbish to us.

**We aim to eradicate the need
to use landfill for disposing of
waste materials. We see waste
as a resource to be reused,
recycled, or turned into energy.**

**Together we're transforming
today's waste into tomorrow's
energy.**

Thalia.co.uk



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