

# Modern slavery statement

This statement sets out SUEZ's actions to identify all potential modern slavery risks related to its business in the UK and to put in place reasonable steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

All references to SUEZ in this statement include all UK SUEZ Group companies, all of which have endorsed this statement and the actions within.

## Introduction

Slavery, servitude, forced labour and human trafficking (Modern Slavery) is a world-wide and growing issue given the rapid rise in global migration. The sector in which we operate can be attractive to perpetrators of this type of crime, so as a leading integrated water and waste management and recycling business in the UK, the company recognises the need to adopt a robust approach to slavery and human trafficking. SUEZ has a zero-tolerance approach to Modern Slavery within our operations and supply chain, and staff are expected to report concerns, using a variety of appropriate reporting channels, and we are committed to act upon any such reports.

SUEZ in the UK commits to developing and delivering a proactive approach to tackling hidden labour exploitation. We will achieve this by a number of steps:

- The creation of a company statement endorsed by the Chief Executive Officer for SUEZ recycling and recovery UK and the Senior Management team for SUEZ water technologies and solutions UK and communicated throughout the business.
- The existence of an appropriate policy on preventing hidden labour exploitation which will be reviewed on a regular basis.
- The existence of practical and pragmatic working procedures to support local management in this aim.
- The delivery of training for key managers using both external organisations and internal resources. A key support relationship has been developed and maintained with the organisation "Hope for Justice".
- A communications plan to highlight Modern Slavery and where to seek help. Posters at sites provide information on Modern Slavery and numbers to call, for example SUEZ's independent Whistleblowing Line and Hope For Justice.
- Working closely and engaging with employees and employee representative bodies as part of preventative strategies.

## Organisational structure and supply chains

SUEZ operates at over 300 sites across the UK providing recycling and recovery services, and water services. Our business headquarters are in Maidenhead, UK, and we employ over 5,000 people across the UK Group.

We have relationships with external businesses to source labour and materials/waste for our business. The majority of our suppliers are UK companies. Suppliers of goods and services to SUEZ must comply with all 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. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## Relevant policies and procedures

SUEZ has in place the following policies and procedures 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 – reviewed annually.
- Whistleblowing Policy – SUEZ uses an independently-provided whistleblowing hotline, which provides an easy and confidential means for concerns to be raised. We investigate every whistleblowing case and seek to achieve a resolution as soon as practicable.
- Employee Assistance Programme – provides an external and confidential support service by telephone through which advice and information are imparted to employees across a wide range of topics. This service also includes face-to-face counselling.
- “We hear” confidential employee support line, run by employees for employees.

Supplier code of conduct – 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.

## Training

We are working with ‘Hope for Justice’ (<http://hopeforjustice.org/united-kingdom/>), an international anti-human-trafficking charity, in providing a program to promote awareness of modern slavery. This has been prioritised in the areas of our business operations where the risk of modern slavery practices have been assessed to be the greatest and includes:

- Training for key personnel.
- The distribution of an employee newsletter and posters.
- The training includes:

- Introduction to Modern Slavery.
- Relevance to SUEZ.
- Definitions of Modern Slavery.
- What to do if they spot signs of Modern Slavery in UK.
- Where to go for more information.

SUEZ has trained circa 100 employees to date.

## **Practical steps taken in the financial year ending 31st December 2017**

To underpin our compliance, we implemented the following measures:

- Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery, so that efforts can be focused on those areas.
- Engage with our suppliers both to convey to them our Anti-Slavery and Human Trafficking Policy and Supplier Code of Conduct and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
- Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- Train staff as set out above.
- Review policies and procedures to ensure fit for purpose.

The Company will consider the impact on any person working for us or on our behalf who believes they are a victim of slavery, human trafficking or forced labour, and aims to support any such person, including assisting that person in reporting this concern to the appropriate authorities.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the SUEZ anti-slavery and human trafficking statement for the financial year ending 31st December 2017.

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

*David Palmer-Jones, Chief Executive Officer, SUEZ recycling and recovery UK  
On behalf of SUEZ recycling and recovery UK Group Companies*

*Katherine Walsh, UKIN HR Manager, SUEZ water technologies and solutions UK  
On behalf of SUEZ water technologies and solutions UK Group Companies*