

Shanks Group plc Modern Slavery Statement

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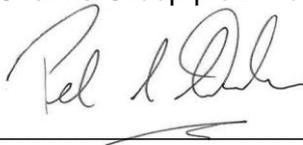
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Statement

Modern Slavery is a term used to encapsulate offences in the Modern Slavery Act 2015 and takes various forms such as slavery, servitude, forced and compulsory 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 its supply chain, plus taking appropriate action where necessary. Shanks Group plc (the "Company") has a zero tolerance approach to modern slavery of any kind within its business and its supply chains. The Board seek to enforce this ethos within every aspect of the business, including its supply chains, and will take the necessary steps should any member of staff or any of its suppliers act to the contrary. Through identifying key risk and adopting measure to combat such, the Board of Shanks Group plc (the "Board") is confident, as far as possible, that there are and will continue to be sufficient steps in place to discourage and deter modern slavery within its own business and that of its suppliers. The Company's policies reflect its commitment to acting ethically and with integrity in all its business relationships. Where necessary the Company will look to further strengthen controls throughout its business and wider supply chain and seek to develop its policies in this area in line with best practice and continuous improvement principles.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Shanks Group plc's Modern Slavery Statement for the current financial year.



Peter Dilnot,
Chief Executive Officer

1. Our Organisation

Shanks is a leading international waste-to-product business.

The Group uses a range of cost-effective sustainable technologies to make valuable products from what is thrown away. We produce green energy, recovered fuel, recycled commodities and organic fertiliser.

Shanks meets the growing need from public and private sectors to manage waste sustainably without damaging the environment. Our solutions reduce greenhouse gas emissions, recycle natural resources and limit fossil fuel dependency.

Shanks operates in three divisions that reflect our markets: Hazardous, Commercial and Municipal. It has operations in the Netherlands, Belgium, UK and Canada and employs around 3,500 people.

2. Risk and Exposure

The Board acknowledges that the Company is exposed to a relatively low levels of risk with regards to modern slavery within its own business. However, the Company is committed to identifying such risk and putting in place appropriate control measures.

A greater risk is the potential for modern slavery within the Company's supply chains. Below outlines the risk and exposures identified by the Board and the mitigation measures put in place in relation to the Company's staff and to its suppliers.

3. Our Staff

Shanks Group plc promotes a healthy working environment. The health and safety of staff is the Company's top priority. Their wellbeing and commitment is critical to the Company's success. Every member of staff has the right to feel safe at work and to get home safely at the end of each working day.

All staff are paid above the national minimum wage and the Company complies with its obligations under the Working Time Regulations.

The Company has a well-established whistleblowing policy. Employees with concerns are able to confidentially contact the Company's independent 24/7 SpeakUp system to report them. All whistleblowing and similar reports are fully investigated and action is taken if the report is substantiated, ensuring that the Company's values are maintained.

All employees must adhere to the Company's Code of Conduct which is made up of number of policies including Bullying and Harassment Policy, Disciplinary Policy, Equal Opportunities Policy and Grievance Policy.

The Company operates all sites with competent management teams to ensure optimum control of the work environment. To ensure a high level of understanding of the risks of modern slavery in its business, the Company will be implementing training to all senior members of staff and the Procurement teams. Furthermore, the Company will raise awareness through its Group Magazine and Newsletters as well as creating an awareness group on its Intranet.

4. Suppliers

The Board has identified the Company's supply chain as its most significant risk in relation to modern slavery. Given the variances in the type of direct suppliers engaged by the Company and

indirect suppliers through the respective supply chains, the Board has categorised three types of suppliers, namely, Corporate Suppliers, Service Providers and Other Suppliers.

The Company will report any type of supplier to the relevant authorities where it considers necessary to do so.

Corporate Suppliers

Where possible the Company builds long-standing relationships with suppliers and makes clear its expectations of business behaviour.

The Board expects all Corporate Suppliers, and suppliers within their own supply chain, to take the same anti-slavery and human trafficking stance as the Company and, where required by law, to produce an Annual Modern Slavery statement pursuant to section 54(1) of the Modern Slavery Act 2015.

As a minimum, the Company expects its Corporate Suppliers to apply the following standards (together the "Employment Standards") within their own business and take reasonable steps to ensure the same is adhered to within their own supply chains:

- Employment is freely chosen;
- Working Conditions are safe and hygienic;
- Child labour is not used;
- Minimum wage is paid (at least);
- Working hours are not excessive;
- No discrimination is practiced;
- No harsh or inhumane treatment;
- No Corporal punishment, withholding of wages for work carried out, mental or physical coercion or verbal abuse; and
- Compliance with all applicable laws and respecting human rights.

Where the Company considers a Corporate Supplier has failed to comply with any of the above, the Company will undertake an automatic review of the Corporate Supplier's contract with the Company including consideration of action for a potential breach, including termination.

Service Providers

Similar to Corporate Suppliers, the Board expects all Service Providers to take the same anti-slavery and human trafficking stance as the Company. The Company also expects Service Providers to apply the same Employment Standards and will take the same action in the event the Company considers the Service Provider has failed to comply.

The Company engages temporary staff throughout its operations and only works with reputable Employment Agencies, who are expected to comply with the above requirements.

Where Service Providers' staff or temporary staff engaged through an Employment Agency attend one of the Company's sites, the Board believes that these individuals should have the same right to feel safe at work and to get home safely at the end of each working day as our own staff. Any Health, Safety and Environmental breaches or incidents by or involving Service Providers' staff is reported to the Board and appropriate action is taken.

Other Suppliers

Due to the nature of the business of Shanks Group plc, it becomes increasingly difficult to monitor compliance with modern slavery principles at the bottom of the supply chain. For example, our Municipals division's primary service is to offer to Councils or Local Authorities treatment and diversion of waste from landfill. This results in a product which can then be provided to third parties to use as fuel or recyclates. The general public are the initial source of the waste and are therefore ultimately linked to the Company's supply chain.

The Board noted that there were controls in place to determine the type, quantity and region of waste received, but it did not and could not have a detailed overview of where and from whom such waste originated. Although the Board will continue to support the elimination of modern slavery, the Company is unable to intrude upon, monitor or impose any restrictions on the general public.