

## Beuparc Group Ireland and UK Modern Slavery and Human Trafficking Statement FY 18



### Introduction

The Beuparc Group is issuing this statement to set out the actions we have taken during 2018 and continue to take to ensure that our business and supply chains are slavery free. Beuparc recognises that such an approach is an important part of our corporate responsibility and we will continue to review the steps we take.

**The Modern Slavery Act 2015** commits each business to publish a statement on their website which sets out their policy in this area. Its aim is to increase transparency as well as ensuring it is easily accessible to anyone who wants to see it, the public, consumers, employees and Investors.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Beuparc has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

### Our Business

The Beuparc Group is a leading utilities and waste management company providing a comprehensive range of waste, and recycling management services and solutions across Ireland and the UK.

We are structured in relation to the service we deliver and have Commercial and Domestic Waste Management, Energy, Commercial Vehicle and Fleet Management Services, supported by Corporate Strategy, Operational Policy and our key corporate services that include the Supply Chain and Human Resource functions.

We have a developing Compliance Management Framework, which takes into account our corporate ethical position and we are building this into our governance approach. This will support continual improvement of our policies and procedures that are implemented across Beuparc both in Ireland and the UK.

Beuparc recognises that slavery and forced labour can take many forms, including human trafficking and child labour. We maintain regular contact and relationships with our suppliers and recognise that our Group is exposed to greater risk when dealing with its suppliers, particularly those who have operations/suppliers in other territories.

### Steps Taken

The following measures to review and manage this risk occurred in 2018:

- a) an examination of supply chains. We have mapped our supply chains and have identified all our suppliers for the financial year 2018; of these;

- 100% are located within the UK or other low risk countries
  - A number of such companies have an annual turnover of >£36 million, and are therefore covered by the Modern Slavery Act requirements
  - confirmation by our top Suppliers of compliance to the Act through their own modern slavery statements
  - commitment to collaborate closely with Suppliers to help them understand and work towards their own obligations under the Modern Slavery Act
  - Supplier Code of Conduct, used for all new major suppliers of goods or in re-tendering, clearly stating Beuparc's intention to step away (without penalty) if any occurrences of modern slavery is discovered and/or ignored.
- b) Training and awareness. This encompassed;
- Training for team leaders and supervisors;
  - Regular review meetings with our managed service and agency workers provider.
- c) Due Diligence. Beuparc undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. This review includes evaluating the modern slavery and human trafficking risks of each new supplier.

### **Related Policies and Procedures**

Beuparc has in place the following policies and practices 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; reiterating our stance against all forms modern slavery, the policy outlines our procedures and processes which are designed to guard against the occurrence of modern slavery or human trafficking in our business operations and supply chain;
- Whistleblowing policy and procedure; Beuparc is committed to conducting its business with honesty and integrity and we expect all staff to maintain highest standards in accordance with our policies and procedures. A culture of openness and accountability is essential in order to prevent illegal, unethical behaviour or wrongdoing occurring and such culture of openness and accountability is further required to ensure Beuparc can address such situations when they do occur.
- Supplier code of conduct - Beuparc insists on ethical standards from all of our suppliers. 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.

We have not been made aware of any human trafficking or slavery activities within the supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

This statement was approved on 26<sup>th</sup> July 2018 by the Beuparc's Board of Directors who review and update it annually.