



MODERN SLAVERY POLICY

Introduction

This statement sets out LondonEnergy 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.

As part of the waste industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Company structure and supply chains

This statement covers the activities of LondonEnergy Limited.

The principal business of LondonEnergy is the disposal, keeping or treatment of waste and the transfer and recycling of waste, including its incineration and conversion into electricity. The Company carries out its activities in the UK.

High-risk activities

The Company does not have any activities that it considers to be at high risk of slavery or human trafficking:

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** The Modern Slavery Policy is the responsibility of the Head of People.

- **Risk assessments:** The Company undertakes to ensure that new employees, be they permanent, temporary or agency workers are in possession of documentation proving their eligibility to work.
- The Company employs a number of contractors on site during the year. The relevant provisions of the Modern Slavery Act are referred to in the contract between the Company and the contractor. Contractors are obliged annually to submit a return to the Company confirming that they are complying with the law.
- **Investigations/due diligence:** The HR department is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. Acting both pro-actively through engagement with all workers on site, and in reaction to any notification of potential behaviour which could be in infringement of the law, where necessary a full investigation would be carried out and action taken, which may include involving external agencies.

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.

- **Whistleblowing Policy** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of reprisals.
- **Employee Code of Conduct** The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour.
- **Supplier/Procurement Code of Conduct** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code. Serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- **Agency Workers 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. All agency staff must present their documentation confirming their eligibility to work in the UK prior to commencing work at the Company premises.

Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers by taking the following steps:

- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Invoking sanctions against suppliers that violate our supplier/Procurement Code of Conduct, including the termination of the business relationship.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2019. This statement was approved by the Board of Directors on 23rd May 2019.

SIGNED:



JOB TITLE: CHAIRMAN OF THE BOARD

DATE: 23rd May 2019

