



1. Purpose

As outlined in its Modern Slavery and Human Trafficking Policy, Veolia is committed to combating Modern Slavery and the conditions that enable it. The Modern Slavery Escalation Procedure (“Procedure”) provides guidelines to be followed when Modern Slavery is identified or suspected within Veolia’s operations or supply chains.

Why this is important

Veolia is committed to providing an environment where human rights are protected and respected. Veolia demonstrates a firm commitment to the Sustainable Development Goals (SDG) set by the UN to achieve a better and more sustainable future for all. In accordance with SDG 8, Veolia promotes sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

Veolia’s commitment to the UN SDGs translate into both its rules of conduct and its actions - this involves creating the conditions for the day-to-day ethics that are a primary focus of its governance.

2. Scope

This procedure applies to all Veolia entities across the UK and Ireland.

3. What is modern slavery?

Modern Slavery describes situations where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom. Modern Slavery ranges from minor and major labour law violations, such as substandard or dangerous working conditions, through to situations where people are unable to leave their workplace or stop working, as in cases of forced labour, servitude or slavery. It is generally agreed that Modern Slavery includes any of the following nine types of serious exploitation:

1. Trafficking in persons;
2. Slavery;
3. Servitude;
4. Forced marriage;
5. Forced labour;
6. Withheld or on payment of wages
7. Debt bondage;
8. Deceptive recruiting for labour or services; and
9. The worst forms of child labour, where children are subjected to slavery or similar practices.

4. Governance, roles and responsibilities

Veolia has set out the following roles and responsibilities to ensure implementation of the procedure.

Role	Responsibility
Senior Executive VP, Northern Europe	Overall accountability for Modern Slavery related matters
Chief Human Resources Officer	Designated Officer for Whistleblowing
Chief Operating Officer	Executive Modern Slavery Sponsor



Role	Responsibility
Chief Compliance Officer	Ensures risk remediation from a compliance perspective
Chief Legal Officer	Ensures risk remediation from a legal perspective
Modern Slavery Executive Subcommittee	Meets twice per year with the Modern Slavery Working Group to review and discuss targets, progress, and KPIs
Modern Slavery Operational Lead	Coordinates the organisation's response to the risk
Modern Slavery Working Group	Coordinates the organisation's response to the risk
Employee and Line Manager	Remain vigilant to potential signs of Modern Slavery and report any suspected signs
Visible teams (Employee Relations & Risk & Assurance)	Act as a physical point of contact for employees to raise concerns

5. Procedure

Sections A and B provide a guide to handling concerns relating to potential victims of modern slavery within;

1. Veolia's operations, or its supply chain (**Section A**), or
2. Outside of Veolia within local communities (**Section B**)

SECTION A - Modern Slavery concern in Veolia's operations or supply chain

1. Identification of risk indicators

Signs of modern slavery include, but are not limited to:

- a. A worker appears to be under the control of someone else and reluctant to interact with others
- b. A person does not have personal identification on them
- c. A person has few personal belongings, wears the same clothes every day, or wears unsuitable clothing for work or weather conditions
- d. A person appears not to have freedom of movement
- e. A person appears reluctant to talk to strangers or to persons in authority
- f. A person appears frightened, withdrawn, or shows signs of physical or psychological abuse
- g. A person (or persons) are dropped off and collected for work, always in the same way, especially at unusual times, i.e. very early or late at night.

If you suspect that someone is a victim of modern slavery or human trafficking, **DO NOT confront them or attempt to investigate yourself** as this may likely lead to increased harm for them. Instead, follow the steps outlined in this procedure, so that the matter can be fully investigated and dealt with safely and appropriately.

2. Reporting modern slavery concerns

Where concerns exist, the following steps should be taken;



- a. If the person is in immediate danger contact the Emergency Services on 999 and then follow the Veolia UKI Whistleblowing procedure as outlined below.
- b. For concerns (excluding immediate danger) follow the Veolia UKI Whistleblowing procedure which includes;
 - o Our confidential helpline 0800 169 3460
 - o Our anonymous online reporting tool - veolia.whispli.com/ethique

Concerns raised via the Whistleblowing procedure will be passed to the nominated individuals in the HR and Compliance teams who will safely and carefully assess the situation.

The alert will be recorded by the Chief Compliance Officer or Chief Human Resources Officer.

3. Investigation of modern slavery concerns

The Chief Compliance Officer and Chief Human Resources Officer will ensure that any concerns are appropriately investigated, in conjunction with the Modern Slavery Working Group, and Legal Representatives, and with reference to Appendix A.

External parties may be involved in this investigation, as required, to offer advice and guidance. If a modern slavery concern is investigated and subsequently found to be proven, a remediation plan shall be implemented, with reference to Appendix A.

SECTION B - Modern Slavery concern within a local community

1. Identification of risk indicators

Signs of Modern Slavery include, but are not limited to:

- a. A worker appears to be under the control of someone else and reluctant to interact with others
- b. A person does not have personal identification on them
- c. A person has few personal belongings, wears the same clothes every day or wears unsuitable clothing for work or weather conditions
- d. A person appears not to have freedom of movement
- e. A person appears reluctant to talk to strangers or to persons in authority
- f. A person appears frightened, withdrawn, or shows signs of physical or psychological abuse
- g. A person (or persons) are dropped off and collected for work, always in the same way, especially at unusual times, i.e. very early or late at night.

If you suspect that someone is a victim of modern slavery or human trafficking, **DO NOT confront them or attempt to investigate yourself** as this may lead to increased harm for them. Instead, you can report your concerns to the appropriate authorities, so that the matter can be fully investigated and dealt with safely and appropriately.

2. Report any modern slavery concerns to relevant authorities

In the UK, if you suspect someone might be a victim of slavery, you have several options:

- a. Call the police on 101 (or 999 in an emergency)
- b. Call the Modern Slavery Helpline on **0800 0121 700** or fill out an online form.
- c. Contact the Gangmasters and Labour Abuse Authority (GLAA) to report concerns about the mistreatment of workers on **0800 432 0804**, or by email intelligence@glaa.gov.uk
- d. Contact Crimestoppers on **0800 555 111**
- e. Contact Anti-Slavery International or other specialist anti-slavery organisations



In Ireland, if you suspect someone is a victim of human trafficking:

- a. Call the local Gardaí immediately on 112 or 999 (if in immediate danger).
- b. Contact Crime-Stoppers on 1800 25 00 25 or email blueblindfold@garda.ie.

Appendix A

For HR, Compliance, Legal, and the Modern Slavery Steering Group only

Veolia investigation guidelines for working with suspected modern slavery victims

Guidelines are required if Veolia encounters a suspected victim or victims of modern slavery. These guidelines provide a framework only - Veolia teams should always seek the support of a third party and/or legal advice where appropriate.

1. Human rights

Victims of modern slavery and human trafficking have experienced human rights abuses and are victims of crime. They may therefore have legal rights and entitlements under UK or Irish law. A victim's human rights must be respected, without discrimination, regardless of race, religion, sex, gender, sexual orientation, age, disability, or other characteristics, or on the basis of the type of exploitation they may have experienced, or whether they believe they have been trafficked or not. If a person is suspected of being trafficked, the following information provides a guideline concerning potential support services and next steps:

- a. Trafficking, slavery, servitude, forced labour, deceptive recruiting for labour or services, organ trafficking, forced marriage and debt bondage are criminal offences. Victims of these crimes may be eligible for assistance.
- b. Legal and migration advice can only be provided by qualified solicitors and migration agents; with the internal legal team advised where appropriate.
- c. There may be other rights and entitlements that a victim may have for which they should seek independent legal advice.

2. Creating safety plans

If Veolia encounters a modern slavery victim or victims, it may be appropriate to develop and implement a Safety Plan in partnership with a third party trusted organisation. A safety plan can help a modern slavery victim to protect themselves from further harm and to seek help safely. A safety plan should:

- a. Outline how and where to find help,
- b. Outline how to talk to other people safely, and plan ahead to respond appropriately in unsafe situations.

Obtaining informed consent from a victim is a vital first step that should precede any discussion with a modern slavery victim, or any action taken (or not taken) on their behalf.

The person must:

- a. Receive and consider all the relevant facts and information they need to make a decision, including their right to refuse to proceed.
- b. Be presented with information that is unbiased, and accurate.
- c. Be provided with clear information in an appropriate format.
- d. Have access to translation if it is required – an interpreter of the trafficked person's preferred ethnicity and gender should be used, or material that has been accurately translated into the person's preferred language.



- e. Be provided with information about community and government services.
- f. Must NOT be pressured to make decisions quickly. The person should be given adequate time to consider the information they have received and their options. It may be reasonable to give the person a cooling off period to process the information they have received or to provide this information over a period of time and to possibly revisit the information again once the person has had time to process it.

Veolia is not expected to produce a safety plan without advice from an organisation who supports victims of modern slavery.

3. Provision of Appropriate Referrals

There may be cases where an employee of Veolia is the first point of contact for a modern slavery victim. In this instance, Veolia will provide victims with information about the services that can help them as soon as possible, so that they may make informed choices about what services, if any, they want to access.

Referrals may include: victim support, legal and migration advice, accommodation or refuge services, financial support, translation services, psychological support, medical treatment, police intervention.

4. Ways to protect privacy and confidentiality

Veolia understands that in suspected cases of modern slavery, privacy and confidentiality is of paramount importance and will adhere to the following guidelines:

- a. Personal information that may identify a modern slavery victim may only be processed where one of the following apply and, in all cases, the data protection team should be consulted in advance:
 - o Veolia has a legal obligation to process the victim's personal information
 - o Where it is in the vital interests of the person to process their personal information, or
 - o Where the victim has provided consent for their personal data to be processed.
- b. Veolia will only collect information which is necessary to provide services to victims in conjunction with a trusted third party.
- c. Veolia will obtain legal advice before responding to any demands to hand over documents.
- d. Veolia will not transmit, store or dispose of information via non-secure means. e.g. putting private documents in a general rubbish bin, or giving information to a journalist.
- e. Veolia will not reveal information about a modern slavery victim which may cause them to be identified to the public.
- f. Veolia will ensure the security of any electronic devices used to store or access information about a modern slavery victim..

5. Appropriate services

Veolia understands that victims may come from culturally and linguistically diverse backgrounds. They may face certain barriers when accessing services. For example, the person may;

- a. have limited English language skills
- b. be unfamiliar with the UK legal system
- c. be unaware that all forms of trafficking, slavery, servitude, deceptive recruiting for labour or services, forced marriage, forced labour and debt bondage are illegal
- d. be unsure about their rights as migrant workers
- e. fear people in positions of authority, such as police and immigration officers

Consequently, Veolia will ensure that, where possible, appropriate services are provided for persons suspected of being trafficked.



6. Child trafficking and exploitation

The best interests of the child (including the right to physical and psychological recovery and social integration) must be paramount at all times.

Children are capable of forming and freely expressing their own views as to their best interests. However, in order to act in the best interests of the child, these views may sometimes need to be overridden. Therefore, if Veolia' suspects that a child has experienced or is at risk of human trafficking, slavery or slavery-like practices, we will seek specialist external support.

7. Victim centred approach

Veolia recognises that each situation and each victim is unique and requires different kinds of assistance, and, when dealing with modern slavery victims, it is important to first and foremost consider their point of view.

People who have been trafficked or have experienced slavery, or slavery-like practices such as forced labour or forced marriage may often be fearful or distrustful of authority figures (such as the police or immigration) or fear the consequences of speaking to anyone about their situation. When working with victims, it is also important to recognise that factors such as sex, gender, sexual orientation, ethnicity, cultural and social associations can all impact on communication and may influence how a situation should be managed.

Victims may come from a variety of different cultural and linguistically diverse backgrounds. An awareness of the importance of cultural sensitivity in relation to racial, ethnic, national, social and linguistic factors is an important part of professional practice when working with victims of modern slavery.

These circumstances should always be managed sensitively and appropriate referral services should be contacted, to ensure that individuals' needs are respected, understood and effectively responded to.