

Modern Slavery and Human Trafficking Policy & Procedure

Veolia Management System - Run the Business



1. Introduction

Veolia is committed to upholding the highest standard of ethics, compliance, and integrity in all our business dealings and relationships. We believe in transparency throughout our operations and supply chains, aligning with our disclosure obligations under the UK Modern Slavery Act 2015 and equivalent laws in Ireland. We have zero tolerance for modern slavery and human trafficking in any form and continuously review and enhance the effectiveness of our systems and controls to prevent and detect any form of modern slavery within our operations and supply chain.

We strictly adhere to local and national laws and uphold our workers' right to freedom of movement, freedom of association, and the right to terminate their employment at will. We also hold our suppliers, customers, contractors, and other business partners to the same standards.

Should we ever identify instances of modern slavery within our operations or supply chain, we will work with the appropriate authorities to ensure support in accessing remedies, compensation, and justice for victims.

This policy should be read alongside our Global and UK&I Human Rights Policies and the Veolia Group Ethics Guide.

2. Scope

This policy applies to all UK and Ireland-based employees, agency workers, seconded workers, volunteers, interns, business partners, suppliers and others associated with our company at any operational site, office location or company-sponsored event. The policy has been produced in consultation with Unite, the GMB, Unison, United Road Transport Union and Prospect.

3. What is Modern Slavery and Human Trafficking?

Modern slavery is a complex issue encompassing various forms of exploitation, including forced labour, debt bondage, forced marriage, and human trafficking. It involves situations where individuals are forced to remain due to threats, violence, coercion, deception, or abuse of power. There are international legal agreements against modern slavery, including the 1926 Slavery Convention, the 1956 Supplementary Convention on Slavery, the 1930 Forced Labour Convention, the 1957 Abolition of Forced Labour Convention and the International Covenant on Civil and Political Rights.

Human trafficking, a component of modern slavery, involves the movement of people into exploitative conditions against their will. It consists of three elements: an action (recruitment, transportation, or harbouring), a means (threat, coercion, or deception), and exploitation (forced labour, sexual exploitation, or organ removal). Victims are often moved to locations where they lack language skills or knowledge to seek help and may be passed or sold to different traffickers.

The International Labour Organisation (ILO) has identified 11 indicators that may signal the presence of forced labour, highlighting the diverse nature of modern slavery and the importance of vigilance in identifying and combating these practices.

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

Examples of modern slavery and human trafficking in our operating sector could include:

- Unpaid or underpaid labour supplied by a third party e.g. for collection or sorting operations;
- Suppliers of workwear who use exploited labour to produce the clothing;
- A person employed directly at a site who joined under the control of an individual or organised crime group, which retains some or all of the person's wages.

4. Our Commitments

Our commitment to the [UN Sustainable Development Goals](#) translates into our rules of conduct and actions. This involves creating the conditions for the day-to-day ethics that are a primary focus of our governance.

Our Modern Slavery and Human Trafficking Working Group is responsible for assessing, enhancing, and monitoring steps, by Veolia and its suppliers, to meet compliance standards. We manage risk by implementing improvements and monitoring progress against a three-year rolling programme. Our Working Group reports to the UK Modern Slavery Executive Subcommittee and comprises a cross-section of HR, Supply Chain, Operations, Legal, Compliance, and Sustainability representatives. Our Modern Slavery Lead is the Chief Compliance Officer. Our Working Group meets regularly, with individual members meeting more frequently to drive specific projects and initiatives.

Our Working Group produces a Veolia UK Modern Slavery and Human Trafficking Strategy Paper that is the basis of our three-year rolling programme. Our progress is published annually in our annual Modern Slavery Statement via our website, and the Government Registry, per the UK Modern Slavery Act. Key measures include:

- Supply chain due diligence through a standardised, risk-based, supplier onboarding and assessment process;
- Development and expansion of a risk-based supplier audit programme;
- Veolia Supplier Charter - suppliers must sign to demonstrate their commitment to operating according to Veolia's Purpose and values;
- Robust employee onboarding checks including validation of right-to-work documentation and checks for duplicate bank accounts and addresses;
- Blended learning (e-learning, face-to-face training, operational briefings) to raise awareness of Modern Slavery at all levels of the business;
- Collaboration with Supply Chain Sustainability School to conduct Modern Slavery workshops for key suppliers;
- Communicated escalation policy with procedural guidelines for when Modern Slavery is identified or suspected within our operations or supply chains;
- KPIs within our globally applied multi-faceted performance framework, driving and tracking training delivery and completion, driving awareness campaigns, and recording third-party audits and resulting actions

5. Modern Slavery Escalation Procedure: Reporting Modern Slavery Concerns

We each have a shared responsibility for ensuring the highest standards of ethical conduct, compliance, and integrity in all our business dealings and relationships. If you have any concerns that slavery or human trafficking may be taking place in any part of our business or supply chain, please report your concerns immediately. We will not tolerate any victimisation of individuals who raise concerns in good faith under this policy.

Modern Slavery awareness posters (displaying how to report concerns) are located at Veolia sites in communal and private areas. Our Whistleblowing and reporting Policies and Procedures for the UK and Ireland can be accessed via the **Veolia UK and Ireland [Compliance and Ethics intranet page](#)** and our Veolia Management System (the VMS). Further information on whistleblowing is provided in section 5.2. **Where a person may be in immediate danger, you should contact the police by dialling 999.**

5.1 Reporting Modern Slavery Concerns Internally (inside Veolia)

Signs of Modern Slavery may include (but are not limited) to the following:

- Someone who always wears the same clothes, often not suitable for their work or the weather;
- Someone unfamiliar with the local area or language;
- Someone who has unexplained or untreated injuries;
- Someone who is always being dropped off at or collected from work (in the same pattern, especially at unusual times, i.e. very early or late at night);
- Someone who avoids conversation or interaction;
- Someone who is reluctant to talk to authority figures; or
- Someone without documentation or money.

If you suspect modern slavery, refrain from confrontation or personal investigation, as this may endanger the victim. Instead, follow the procedure outlined below to ensure a safe and appropriate professional response. **Where a person may be in immediate danger, you should contact the police by dialling 999 and inform your manager.** If the person is not in immediate danger, inform your manager and follow our Whistleblowing Procedure.

The Chief Compliance Officer and Chief Human Resources Officer will ensure that any concerns are appropriately investigated, in consultation with the Modern Slavery Working Group, and Legal Representatives. External parties may be involved in the investigation to offer advice and guidance. If a modern slavery concern is investigated and subsequently proven, a remediation plan shall be implemented.

5.2 Whistleblowing Procedure

We have a confidential Whistleblowing Telephone Line and an anonymous online Whistleblowing Platform available to all employees and third parties for reporting concerns or suspicions of wrongdoing. The confidential reporting mechanisms are independently operated by a third party with a clearly defined reporting and investigation process, and Veolia designated officers. Concerns raised under the Whistleblowing Procedure will be passed to the nominated individuals in the HR and Compliance teams who will safely and carefully assess the situation. Alerts will be recorded by the Chief Compliance Officer or Chief Human Resources Officer. The Whistleblowing Channels for the UK and Republic of Ireland are as follows:

UK: Report the issue anonymously by calling our UK Whistleblowing Telephone Line. This confidential telephone line is available 24 hours a day, 365 days a year: 0800 169 3460. Or report a concern anonymously using our global digital Whistleblowing Platform, Whispli. Visit <https://veolia.whispli.com/ethique> or call 0118 230 1870

Republic of Ireland: Report the issue anonymously by calling our Whistleblowing Telephone Line. This confidential telephone line is available 24 hours a day, 365 days a year: 1800 804 349. Or report the issue anonymously using our global digital Whistleblowing Platform, Whispli. Visit <https://veolia.whispli.com/ethique>

For further information please see our Whistleblowing Policy & Procedure which is available to all employees.

5.3 Reporting Modern Slavery Concerns Externally (outside of Veolia)

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

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

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

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

6. Responsibility for this Policy

This policy is produced by the Compliance Department and HR with the Modern Slavery Working Group. The Working Group comprises HR, Supply Chain, Legal, Responsible Business, Compliance, and Operations. The policy has been formally approved by the Modern Slavery Executive Subcommittee, before being reviewed and signed by the Senior Executive Vice President for Veolia Northern Europe.

Contacts

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<p>Confidential Whistleblowing Channels (UK and Republic of Ireland)</p>	<p>UK: Report the issue anonymously by calling our UK Whistleblowing Telephone Helpline. This is a confidential helpline available 24 hours a day, 365 days a year: 0800 169 3460. or the issue anonymously using our global digital Whistleblowing Platform, Whispli. Visit https://veolia.whispli.com/ethique or call 0118 230 1870</p> <p>Republic of Ireland: Report the issue anonymously by calling our Whistleblowing Telephone Helpline. This is a confidential helpline available 24 hours a day, 365 days a year: 1800 804 349. Or report the issue anonymously using our global digital Whistleblowing platform, Whispli. Visit https://veolia.whispli.com/ethique</p>
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Gavin Graveson
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