



1. Policy statement

Slavery (referred to today as modern slavery), and human trafficking, is the deprivation of a person's liberty by another in order to exploit that person for personal or commercial gain. Slavery and human trafficking is illegal and a violation of a person's fundamental human rights. It takes various forms, such as domestic servitude, forced labour, and debt bondage.

According to the latest report, published by the International Labour Organisation in September 2022, almost 50 million people are trapped in slavery globally.

Veolia is committed to acting ethically, and with integrity, in all of our business dealings and relationships, and to implementing effective systems and controls to prevent and detect modern slavery in our operations and supply chain. We are committed to ensuring transparency in our operations and supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015. Our approach is based on a zero tolerance of any form of modern slavery and human trafficking.

In conducting its operations, Veolia will adhere to local and national laws. Workers shall have freedom of movement, freedom of association, and the freedom to terminate their employment.

Veolia prohibits the use of worker-paid recruitment fees, child labour, discrimination, confiscation of workers' original identification documents, and any threat of violence, harassment and intimidation.

In the event that modern slavery is identified within the business, Veolia shall provide support in identifying access to remedies, compensation and justice for victims of modern slavery.

We expect the same standards from our suppliers, customers, contractors, and other business partners.

2. Policy scope

This policy has been implemented following consultation with Unite, the GMB, Unison, United Road Transport Union and Prospect. It applies to all persons working for Veolia entities in the United Kingdom and Ireland, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

The Company may change all or any part of this policy in any way at any time. This policy is non-contractual which means that it does not give any legal rights to individuals.

3. What is 'Slavery and Human Trafficking'?

Slavery and human trafficking can take many forms, but in general "slavery" is where an individual (or group of individuals) exercises dominance over a person (or persons) who are coerced into providing their services, often under threat of penalty, or without adequate reward. The term "human trafficking" refers to the arrangement or facilitation of transportation of an individual (or individuals) with a view to exploitation for personal or commercial gain. Human trafficking may take place from country to country, or within a country e.g. county to county, town to town, or work site to work site.

The International Labour Organisation (ILO) has identified the following 11 indicators that highlight the circumstances where forced labour may be found:

- 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 employee's wages.

4. What is Veolia doing to combat Slavery and Human Trafficking?

Our dedicated Working Group meets at least quarterly, and is committed to the continuous improvement of controls and processes to assist in the identification and prevention of modern slavery within our operations and supply chain. The Working Group is made up of Supply Chain, HR, Legal, Compliance, Responsible Business, and Operational representatives, and meets with the Modern Slavery Executive Subcommittee every six months - the sponsor of the Working Group. Our progress is published annually in our annual Modern Slavery statement via our website, and the Government Registry, in accordance with the UK Modern Slavery Act. Key measures include:

- Standardised, risk-based, supplier onboarding and assessment process
- Developing risk-based supplier audit program
- Robust employee onboarding process with checks being made for duplicate bank accounts and addresses
- Blended learning to raise awareness at all levels
- Communicated escalation policy
- Site posters
- KPIs.
- A requirement for key suppliers to sign up to our Supplier Charter.

5. Reporting Concerns

We all share a responsibility to ensure compliance with this policy. If you have any concerns that slavery or human trafficking may be taking place in any part of our business or supply chain, you must report your concerns immediately.

Modern Slavery **awareness posters** (including how to report concerns) are located at Veolia sites, and our **modern slavery escalation procedure** may be accessed via the VMS (Veolia Management System), or via the Veolia UK and Ireland Ethics and Compliance Intranet page. Externally, our Veolia Group alert tool (Whispli) is accessible via our websites. Where a person may be in immediate danger, you should contact the police.

In accordance with our **Whistleblowing Policy**, Veolia will not tolerate any victimisation of individuals because they have in good faith raised concerns under this policy. The Company will treat such victimisation as a disciplinary matter, which might lead to dismissal. However, nothing in this policy means that someone who has raised a concern under it cannot be managed in the ordinary course of the employment relationship.



6. Responsibility for this Policy

This policy is produced by the Compliance Department in consultation with the dedicated Modern Slavery Working Group which includes HR, Supply Chain, Legal, Responsible Business, Compliance, and Operational representatives. The policy has been formally approved by the Modern Slavery Executive Subcommittee, prior to being reviewed and signed by the Senior Executive Vice President for Veolia Northern Europe.

7. Contacts

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Gavin Graveson
Senior Executive Vice-President Northern Europe
30 November 2022