



Modern Slavery and Human Trafficking

Scope of application

This Policy is applicable to all employees, managers and members of the governing bodies of URBASER S.A., its subsidiaries and holdings/joint ventures in which URBASER is the majority shareholder / partner or where control is held by URBASER's management ("URBASER" or "the Company"). It is the responsibility of all URBASER employees to act professionally and protect the Company's reputation.

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A handwritten signature in blue ink, appearing to read "Javier Peiro", is positioned above the printed name and title.

Javier Peiro
Managing Director

Cheltenham, GL53 7JT

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Introduction

This statement sets out Urbaser Limited's 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 environment management 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.

Organisational structure

Urbaser Ltd is an environmental services company, who work nationally as one of the main operators in the environment sector and is a leader in waste management.

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:

- **Ethics Policy:** An ethical business is one of Urbaser's core principles, which is set out in this policy to show the Company's commitments to follow ethical business practices. The Company will not tolerate any wrongdoing or impropriety at any time, including any form of modern slavery. The Company will take the appropriate measures to act quickly in correcting issues if the ethical code is broken. This policy applies to employees, contractors, consultants and any other workers who provide services.
- **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 retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.
- **Employee code of conduct:** The Company's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Health and Safety Policy:** The policy clearly indicates that all employees, visitors and other workers are to cooperate with Urbaser in the implementation of this policy by "constantly improving Health & Safety standards through the compliance of all relevant statute" including the Modern Slavery Act 2015
- **Recruitment Selection 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.

Due diligence

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As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, we have adopted the following due diligence procedures:

- We require from our suppliers, before appointing them, detailed information of any plans in place in the event labour right concerns are identified in their supply chain
- With regards to national or international supply chains, our contact point is preferably with a UK company or branch and we expect these entities to have suitable slavery and human trafficking policies and processes
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Learning

We invest in educating our employees to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our learning programmes, employees are encouraged to identify and report any potential breaches of the Company's policies. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate these from our business and supply chains.

Breaches of this Policy

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with Suppliers and other third parties if they breach this Policy, details of actions undertaken with regard to remediation and outcomes will be published in the Company's Annual Modern Slavery Statement, and take any action required by the UK Modern Slavery Act 2015.

Reviewing this Policy

This Policy is reviewed periodically by Human Resources, as required

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