

Modern Slavery Statement 2022

Modern slavery is the illegal exploitation of people for personal or commercial gain and covers a wide range of abuse and exploitation including forced labour, bonded labour, sexual exploitation, domestic servitude, and criminal exploitation. Modern slavery is an indefensible and unacceptable violation of a person's basic human rights.

Hidden labour exploitation is exploitation of job applicants and workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well-hidden by the perpetrators; victims, if they perceive of themselves as such, are often reluctant to come forward.¹

Cory supports the elimination of all forms of modern slavery and takes steps to assess and address the risk of modern slavery and hidden labour exploitation in our business and supply chain.

This modern slavery statement is issued in accordance with the Modern Slavery Act 2015 to share the key actions we have taken to eliminate the risk of modern slavery and human trafficking in our business and supply chain, with a particular focus on the actions undertaken during the financial year ending 31 December 2022. This statement also outlines the actions we intend to take in 2023.

This statement is adopted by each company member of the Cory Group.²

OUR BUSINESS AND SUPPLY CHAIN

Cory is one of the UK's leading recycling and waste management companies, based in London. We segregate and process recyclable materials and turn non-recyclable waste into energy and construction materials. We use the river Thames to transport waste on tug-drawn barges to our energy from waste (EfW) facility in Belvedere.

Together with our Riverside 1 EfW facility, we operate:

- Five Waste Transfer Stations (WTS) in Barking, Wandsworth, Battersea, Tower Hamlets and the City of London.
- Two Materials Recycling Facilities (MRFs), in Barking and Wandsworth.
- Two Household Waste and Recycling Centres, in Wandsworth and Tower Hamlets.
- A barge yard and a ship repair yard in Charlton and Gravesend respectively.
- An Incinerator Bottom Ash Transfer Station at the Port of Tilbury.

Cory currently works with commercial and industrial customers and eight London Boroughs to process recyclable and non-recyclable waste including Hammersmith and Fulham, Lambeth, Wandsworth (together the Western Riverside Waste Authority), Bexley, Tower Hamlets, the Royal Borough of Kensington and Chelsea, Barking and Dagenham, and the City of London. It has recently signed a contract to take waste from Hertfordshire County Council from April 2024.

As at the date of this statement, Cory employs around 375 employees directly on our standard employment agreements, which are compliant with UK laws and regulations.

¹ Indirect Procurement Human Rights Forum - Waste and Recycling Sector - Modern Slavery Toolkit - <https://www.circularonline.co.uk/wp-content/uploads/2021/10/Final-IPHR-ModernSlavery-Brochure-1.21-002.pdf>

² The Cory Group comprises Cory Topco Ltd; Cory Holdco Ltd; Denmark Topco Ltd; Denmark Holdco Ltd; Viking Consortium Acquisition Ltd; Cory Riverside Energy Finance Ltd; Cory Riverside Energy Holdings Ltd; Cory Riverside (Holdings) Ltd; Cory Environmental Holdings Ltd; Riverside Resource Recovery Ltd; Riverside (Thames) Ltd; Cory Environmental Ltd; Cory Ship Repair Services Ltd; RHN Holdings Ltd; RHN Developments Ltd; Riverside Energy Park Ltd; SAS Depot Ltd from 31 August 2021; and Cory Barking Holdings Limited, Cory Barking Operations Limited and Cory Barking Property Limited from 18 January 2022.

Each month, Cory engages around 110 agency staff who work at three of our five WTS sites, and at both MRFs. These agency staff are provided through two agency worker suppliers: ALS People and 247Group. We also work with a labour security provider for security services at our Western Riverside and Cringle Dock WTS.

Cory primarily operates in the recycling, waste transfer, energy from waste and maritime sectors. During 2022 we spent £114.5 million on 828 suppliers, of which 95% were based in the UK. Our supply chain spend includes categories such as business services, consumables for our EfW process, mechanical services, third-party training, material handling, plant and vehicles, safety services and goods, electrical services, and utilities.

POLICIES AND PROCEDURES

Our [Confidential Reporting \(Whistleblowing Policy\)](#), together with our internal Whistleblowing Procedures and Guidance, reinforce our culture of openness and transparency by encouraging employees and third parties to speak up if they have concerns about any serious risk or wrongdoing within Cory or within a Cory supplier or customer. If a person is not comfortable raising a matter within the business, they can contact the external, independent whistleblowing service SeeHearSpeakUp to raise a concern.

Our [Sustainable Procurement Policy](#) sets out the principles to which our procurement activities should adhere, including the requirement that our procurement practices are undertaken in a safe and ethical manner and in line with our modern slavery statement commitments.

Our [Supplier Code of Conduct](#) defines the standards which Cory adheres to and which we expect to be equally held by our suppliers, business partners and representatives. The Code includes requirements relating to compliance with the Modern Slavery Act and all applicable anti-slavery and human trafficking laws, regulations and codes.

DUE DILIGENCE PROCESSES IN OUR BUSINESS AND SUPPLY CHAIN

Our key due diligence processes related to modern slavery include:

New employees

We undertake checks for each new employee to ensure that the individual has the legal right to work in the UK and will receive their salary directly. As part of the employee's on-boarding process, their manager is required to obtain a physical copy of an employee's Right to Work evidence in line with Home Office guidance. All wages are then paid electronically using bank account details which must match the employee's personal details on their Right to Work evidence. Where such details do not match, the HR team undertakes further investigation.

Supplier on-boarding

All new suppliers are required to go through our supplier on-boarding process which requires the business to obtain a copy of the supplier's modern slavery statement where it is required to hold one under the Modern Slavery Act. All suppliers are also required to enter terms and conditions relating to identification and mitigation of modern slavery and human trafficking in their business and supply chain regardless of whether they are required to hold a modern slavery statement.

Where reasonably possible, Cory prefers to work collaboratively with new suppliers to proactively identify and manage modern slavery risks rather than not enter a contract. All new suppliers receive a copy of, and are expected to comply with, Cory's Supplier Code of Conduct.

Auditing programme

Each year, we audit suppliers whom we consider having a high risk of the presence modern slavery or human trafficking, for example, due to the nature of their services or due to the composition of their workforce (see below for risk assessment). We also undertake rolling audits of lesser risk suppliers as a matter of course. Our audits are led by relevant members of the business, with support from our Legal Team. As part of the audit, we seek to:

- Ascertain that the supplier is compliant with the requirements of the Modern Slavery Act.
- Understand the risk of modern slavery and hidden labour exploitation in the business and supply chain of the supplier.
- Share ideas on business practices that support Cory's commitment to tackling modern slavery, and which may improve delivery of the supplier's own commitments.

The findings from each audit are shared with our Executive Leadership Team.

Terms and conditions

We use several different forms of terms and conditions when engaging suppliers. All require that the supplier:

- Has and maintains its own policies and procedures to ensure compliance with the Modern Slavery Act 2015, applicable anti-slavery and human trafficking laws, regulations, and codes.
- Notifies Cory as soon as it becomes aware of any breach or potential breach of these laws, regulations, and codes or any of its anti-slavery policies.

Cory's standard terms and conditions enable us to respond appropriately should a supplier breach its modern slavery obligations; for example, we may terminate our agreement and relationship where such a breach has occurred. However, as modern slavery and human trafficking is an evolving crime, we always seek to work with our suppliers using open dialogue and transparency when modern slavery or human trafficking issues arise before enforcing any such remedies.

The Cory Legal Team continues to review any non-Cory standard terms and conditions submitted to by the business and includes Cory's standard modern slavery compliance provisions where none are included. To date, no suppliers have been disqualified from any selection or on-boarding process, and no contracts have not been entered into due to concerns relating to modern slavery or human trafficking.

ASSESSING AND MANAGING OUR RISKS IN 2022

Our modern slavery prevention programme is led by our Head of Sustainability, with support from the Legal Team, Director of Logistics, and operational teams throughout the business. Key performance indicators are included in our sustainability strategy. Implementation of these is tracked by our Sustainability Working Group, with progress reported to our Executive Leadership Team.

We use the Modern Slavery Supply Category Risk Assessment developed for us by Slave-Free Alliance to target our prevention efforts with suppliers in higher risk areas of the business. The assessment found that Cory's 'very likely sector risk' of modern slavery are agency workers in our MRFs and agency workers sourced from small labour security providers. Other small labour providers including skilled and specialist roles, providers of civil works and facilities management services such as cleaning and catering, were also flagged as a 'possible sector risk'.

In September 2022, Slave-Free Alliance undertook a site assessment at Cory's WTS and MRF in Barking which was acquired by Cory in January 2022. During the assessment, worker conditions and the potential exposure of workers to the threat of modern slavery were assessed, focusing on Cory's outsourced labour provision, supplied by 247Group. The assessment found no evidence of modern slavery present in 247Group's workforce deployed to Cory Barking. Several recommendations were made by Slave-Free Alliance in the assessment report and since the assessment Cory and 247Group have taken, and will take, the following steps:

- All Cory employees at Barking will receive modern slavery training from Slave-Free Alliance by January 2023.
- Cory's posters on modern slavery and whistleblowing (including confidential reporting), are now displayed in both English and Romanian on-site.
- 247Group's site supervisor and office staff (who have not already done so) will receive Modern Slavery training.
- 247Group's Modern Slavery Policy will be translated and distributed to all operatives.
- Welfare interviews will be carried out regularly (e.g., monthly) for all 247Group operatives as part of their contract requirements. All interviews will be carried out by a trained senior company employee who does not work on the Barking site.
- All 247Group operatives will be provided with a 247Group telephone number and access to English, Romanian or Polish speaker to provide confidential and anonymous information relating to any concerns regarding Modern Slavery in their workplace, either for them or a colleague.

Cory will continue to engage collaboratively with 247Group on its modern slavery prevention programme to ensure it continues to evolve the robustness of its policies and procedures.

In January 2021, an ALS People agency worker working at the Cory MRF in Wandsworth was identified as being a potential victim of modern slavery during a regular welfare check. Details of the incident and the response, including the findings of an independent gap analysis undertaken by Slave-Free Alliance, are detailed at length in [Cory's 2021 Modern Slavery Statement](#). In 2022 Cory continued in its approach to openly sharing lessons learned from the experience. Cory's Director of Logistics, together with a representative of ALS People, presented on the key learnings and outcomes of the incident during a Slave-Free Alliance members' seminar. To mark anti-slavery week 2022, Cory's Chief Executive sent an email to all employees sharing that a victim of modern slavery had been identified at a Cory site, highlighting the continued importance of Cory's approach to eliminating modern slavery from our business and sharing Cory's toolbox talk on modern slavery to ensure all employees are aware of the signs.

EFFECTIVENESS IN ENSURING THAT SLAVERY AND HUMAN TRAFFICKING ARE NOT TAKING PLACE IN OUR BUSINESS OR SUPPLY CHAIN

As part of continuous business improvement, we regularly review our progress to ensure that we continue to be compliant with the Modern Slavery Act and industry best practice. This knowledge comes from several sources including:

- Our membership of the Slave-Free Alliance, whose advisors help us to identify ways in which we can advance our modern slavery risk identification and prevention programme and keep us abreast of any developments in relation to the Modern Slavery Act.
- Our participation in the joint Environmental Services Association (ESA)/Slave-Free Alliance Waste Industry Working Group, which meets regularly to discuss the issue of modern slavery in the waste industry and gives us the opportunity to learn from other businesses in our sector.
- Our supplier audits, which provide us with the opportunity to discuss the issue with other businesses and learn from their approaches.

From our progress and effectiveness reviews, we have identified the following ongoing and future commitments; as well as generally continuing to improve the robustness of our approach to preventing modern slavery, we will:

- Deliver modern slavery awareness workshops to employees at our new site in Barking and redeliver workshops for managers and supervisors and those with a high level of interaction with higher risk suppliers who were unable to attend when the workshops were first held in 2021. The workshops will include content on the details, outcomes, and lessons learned from the incident of modern slavery identified in our Wandsworth MRF in 2021.
- Publish a Modern Slavery and Labour Exploitation Policy to provide a road map for our day-to-day

operations on our approach towards elimination modern slavery from our business and supply chain.

- Continue to work with Slave-Free Alliance and the ESA/Slave Free Alliance Waste and Resources Working Group to learn from our peers and ensure our prevention programme remains as robust as possible.
- Continue to audit our suppliers who work in industries that are most exposed to the risk of modern slavery and human trafficking, aiming for four audits in 2023, in addition to our two labour providers.
- Examine the way we categorise suppliers and determine whether this could be reorganised to drive improvements in our procurement, supplier onboarding and auditing processes.
- Explore whether the supplier onboarding process can be improved.

TRAINING AND CAPACITY BUILDING

In January 2022, Slave-Free Alliance delivered an executive session to Cory's Board of Directors which covered legislation, high risk business areas, the drivers for increased risks of modern slavery in the UK and the importance of having a robust modern slavery prevention programme.

All new starters receive Cory's Modern Slavery and Human Trafficking Toolbox talk, and in 2022, it was shared with all employees by our Chief Executive, to mark anti-slavery awareness week.

Modern slavery 'myths vs. facts', and 'spot the signs' posters, as well as posters communicating the details of our external, independent whistleblowing service are displayed at all our sites, in English, as well as Polish and Romanian, where these languages are spoken widely at site.

Information on our Whistleblowing procedure is included in both our Antibribery and Anti-Corruption Training and Tax Evasion Training, which all employees are required to complete at the start of their employment with Cory.

This statement is communicated to all Cory employees and is made publicly available on our company website. This statement is made pursuant to section 54(1) Modern Slavery Act 2015 and constitutes Cory's Modern Slavery and Human Trafficking statement for the financial year ended 31 December 2022.

This statement was approved by the Cory Board of Directors on 24 January 2023.



Dougie Sutherland
Chief Executive Officer

Statement dated 24 January 2023.