

MODERN SLAVERY STATEMENT

Modern Slavery Statement 2021

Cory is committed to ensuring that, so far as we are reasonably able, our business and supply chains are free from modern slavery and human trafficking.

Modern slavery is an indefensible and unacceptable violation of a person's basic human rights and human trafficking is an abhorrent crime. At Cory, we recognise our moral and social responsibility to assist in the elimination of the risk of modern slavery and human trafficking within our business and supply chain. We also recognise the need to ensure that our suppliers adopt similar business practices to protect vulnerable workers and help prevent and remedy severe human rights violations in the UK and abroad.

This modern slavery statement is issued in accordance with the Modern Slavery Act 2015 to share the key actions we have taken in up until 31 December 2021, with a particular focus on the actions undertaken during the financial year ending 31 December 2021. This statement also outlines the actions we intend to take in 2022 as part of our ongoing work to eliminate the risk of modern slavery and human trafficking within our business and supply chain.

This statement is adopted by each company member of the Cory Group.¹

1. Our business and supply chain

• Our business

Cory is one of the UK's leading recycling and waste management companies, based in London. We segregate and process recyclable materials and turn London's non-recyclable waste into energy and useful materials.

The due diligence actions we undertake in relation to our workforce is detailed below in section 3 (Due Diligence procedures).

• Our supply chain

We procure services from our suppliers in accordance with several policies including our Sustainable Procurement Policy. All Cory suppliers are required to go through our supplier onboarding 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

¹ 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 McGrath Brothers (Holdings) Limited, McGrath Bros. (Waste Control) Limited and McGrath Bros. (Environmental) Ltd from 18 January 2022.

required to enter into terms and conditions relating to identification and mitigation of modern slavery and human trafficking in their business and supply chain.

When selecting and engaging a supplier, the business is also expected to consider whether a modern slavery audit is required where 'red flag' indicators are present – for example, if the supplier operates within a high-risk sector or provides services using low qualified workers. Concerns held by the business are raised to the Cory Legal Team who work closely with the relevant supplier and the Cory business contact to:

- Understand the risk of modern slavery and human trafficking within the supplier's business or its own supply chain.
- Understand what actions and processes the supplier has in place to identify and mitigate against the risk of modern slavery within its business and supply chain.
- Identify the likely risk of modern slavery within that supplier's business and supply chain.
- Identify the areas of improvement which could reasonably be undertaken by the supplier.

Where reasonably possible, Cory prefers to continue working collaboratively with its suppliers to proactively identify and manage modern slavery risks.

Each year, Cory reviews its supply chain to understand the origin of its suppliers and to identify which suppliers may be identified as 'high risk' and should therefore be contacted to take part in Cory's modern slavery supplier audits.

Based on our 2021 spend, we identified that most of Cory's suppliers are based in the UK.

UK	91.04%
Europe	8.87%
Rest of World	0.09%

In 2021, the Slave-Free Alliance worked with us to undertake a full modern slavery risk 'heat mapping' exercise to enable us to better understand our direct suppliers and wider supply chain. The Slave-Free Alliance assessed our full supplier database and provided a risk 'heat map' based on several factors including:

- The known sector issues. Using Slave-Free Alliance's own data and data gained by other data sources such as the Global Slavery Index, suppliers were categorised using a 'red' (very likely occurrence of modern slavery); 'amber' (possible occurrence of modern slavery); or 'green' (unlikely occurrence of modern slavery) assessment.
- Cory's likely ability to drive improvement in that supply chain (for example, if the supplier is engaged directly by Cory compared to where the supplier is part of an extended supply chain).
- The actions available to mitigate any identified risk.

- The residual risk to Cory which remains following the execution of any risk mitigation action or process.

From this mapping exercise, we were able to identify the sectors and the specific suppliers we needed to work more closely with to ensure that we could collectively reduce the risk of modern slavery and human trafficking. We will use the outputs of the mapping exercise to select which suppliers will be invited to take part in a modern slavery risk audit in 2022.

The mapping exercise required a substantial amount of input from the Cory Finance Team, Cory Legal Team, and advisors from the Slaver Free Alliance to work through and categorise Cory's supplier data. In 2022, we intend to make changes to the way we categorise supplier and change the key supplier information we gather so that this mapping exercise can be more easily undertaken.

2. Policies and standards

We adopt common standards, policies and procedures across Cory. The following policies and procedures further support our modern slavery statement commitments:

- **Whistleblowing Policy and Whistleblowing Procedures and Guidance**

Our Whistleblowing Policy reinforces 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.

Our Whistleblowing Procedures and Guidance also give clear direction to the business and managers receiving any concerns raised under the policy to ensure that such concerns are properly investigated. If a person is not comfortable raising a matter within Cory, they can contact the external, independent whistleblowing service SeeHearSpeakUp to raise a concern.

- **Sustainable Procurement Policy**

This 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.

Cory Sustainability Working Group

At the start of 2021, we formed the Cory Sustainability Working Group, which is responsible for supporting the delivery of Cory's sustainability strategy. The Working Group is led by Cory's Head of Sustainability and is formed of employee representatives from each of Cory's different functions and business units who are appointed by Cory's Executive Leadership Team.

The risk of modern slavery and Cory's modern slavery elimination strategy is one of the key focus areas of the Working Group.

During 2021, the Working Group held a workshop to understand the extent to which the Sustainable Procurement Policy was used and understood across the business and to identify

how the policy could be utilised in a more effective and meaningful way. The Working Group identified a need for specific training on the purpose of the policy and how to apply the policy in practice.

In 2022, we intend to provide training on supplier procurement and engagement. This training will cover how to apply this policy, how to utilise our new Supplier Code of Conduct, and how to audit and work with suppliers to identify and eliminate the risk of modern slavery.

- **Supplier Code of Conduct**

In 2021, we created a Supplier Code of Conduct which defines the basic set of standards which Cory adheres to and which we expect to be equally held by our suppliers, business partners and representatives. The Code of Conduct includes expectations relating to the treatment of people and the Modern Slavery Act.

The Code of Conduct will be rolled out to the Cory business and our supplier partners in 2022.

3. Due diligence procedures

Our key due diligence processes include:

- **Our workforce**

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

Please refer to past modern slavery statements to understand the checks and processes we undertake to ensure that we can identify any potential victim of human trafficking or modern slavery in our business.

- **Agency workers**

Each month, we engage around 80 agency staff across our four transfer stations and Material Recycling Facility (the "MRF"). These agency staff are provided through one agency worker supplier, ALS People, who share with Cory the same culture of transparency, partnership, and collaboration. We also engage two agency staff at Port of Tilbury, and work with the agency provider to mitigate the risk of modern slavery in their organisations and supply chains.

Case study: working through an incident with ALS People

Please refer to our 2020 Modern Slavery Statement, which details the actions and processes which ALS People implements to ensure the wellbeing and safety of its workers. ALS People also publish comprehensive modern slavery statements on the [ALS People website](#) which further detail ALS People's protective and preventative actions and processes. For example, the ways in which ALS People's own staff proactively engage with their agency workers, to ensure their wellbeing, health and safety is paramount.

The robustness of ALS People's processes was demonstrated in January 2021, when an ALS People agency worker working at the Cory MRF was identified as being a potential victim of modern slavery during a regular welfare check. The potential victim had only been working with ALS People for only three weeks.

Immediately following the welfare check, ALS People acted swiftly to safeguard the potential victim, moving them to a safe location and providing a bank card to use. ALS People undertook daily welfare checks over the course of a week before the victim was moved safely to another part of the UK with help and resources from the Salvation Army.

The ability for ALS People to identify the victim and to free the victim from modern slavery is testament to its proactive and rigorous welfare checks. It also exemplifies the positive culture and working environment which ALS People had created and which was present at the Cory MRF amongst its agency workers and staff. Having a positive culture and working environment were critically important as it gave the victim the confidence to speak up and ask for help.

Once the victim's safety had been assured, ALS People requested Slave-Free Alliance to undertake a gap analysis of the situation. The purpose of the gap analysis was to understand what further, if anything, ALS People could have done so to enable the victim to have been identified earlier in time – noting, however, that the victim had only been working with ALS People for three weeks.

The Slave-Free Alliance gap analysis found that:

- ALS People clearly demonstrated that it took a proactive approach to understand and tackle modern slavery.

Slave-Free Alliance identified that the ALS People had in place strong preventative actions. These included the training it provided to its Account Managers, controls implemented within its recruitment processes, intelligence capabilities, and its worker welfare interviews – which was the critical action which enabled ALS People to identify the victim within a very short period.

- ALS People had in place several best practice actions, including display of multilingual slavery awareness materials, active engagement of its workforce and treating its temporary workers like permanent employees, instillation of positive culture and values among workers, and only sourcing workers directly rather than through further labour agencies.
- ALS People demonstrated a strong capability in gathering and assessing relevant information, safeguarding and responding to the needs of victims, and strong leadership which assumed responsibility to coordinate the response and ensured the welfare of its workers were paramount throughout the process.

“Cory and ALS People’s proactive approach to tackling modern slavery was instrumental in identifying and addressing a victim of modern slavery. Their victim-centred approach and welfare provision inspired trust and confidence for the victim to support a police-led investigation against the traffickers.”

- Gary Booth, Technical Services Manager, Slave-Free Alliance

This experience was a reminder of the high risk of modern slavery and human trafficking in the UK waste and manual labour sectors. Modern slavery is a hidden crime – in fact, whilst nearly 11,000 victims of modern slavery and human trafficking were identified last year², Slave-Free Alliance and academic studies have estimated that there are as many 136,000 victims in the UK, with many more trapped in exploitative situations.³ In this context, the ability for ALS People to identify and protect the victim is highly commendable and it gave Cory confidence of the robustness of ALS People’s culture, actions, and processes.

Cory and ALS People continue to have a collaborative and transparent working relationship to ensure that any other potential victims are also able to be identified swiftly and protected from any further exploitation or harm.

- **Supplier assessments – new suppliers**

As part of supplier on-boarding, the business is required to assess whether the supplier should have a modern slavery act statement – either because the supplier is required to hold such a statement under the Modern Slavery Act or should, in our view, have a statement due to the nature of its services.

Training on how these supplier assessments was intended to be provided in 2021 and will now be provided in 2022 as part of a wider procurement training programme.

- **Supplier assessment – existing suppliers**

Each year, we audit several suppliers who we consider to have a high risk of the presence modern slavery or human trafficking. We continued our audit programme in 2021, with continued positive feedback from our suppliers.

Please refer to our past modern slavery statements for information on the purpose and scope of our supplier audits and to read about our previous audits.

- **Terms and conditions**

Please refer to our past modern slavery statements which detail the clauses we include in our standard terms and conditions relevant to the prevention of modern slavery and human trafficking.

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. Where a supplier is not willing to accept our standard modern slavery compliance provisions, the Legal Team holds a discussion with the business to identify whether we can proceed with that supplier.

² Source: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970995/modern-slavery-national-referral-mechanism-statistics-end-year-summary-2020-hosb0821.pdf

³ Source: Slave-Free Alliance.

To date no suppliers have been disqualified from any selection or on-boarding process or contracts unable to be entered into due to concerns relating to modern slavery or human trafficking.

4. Risk and risk assessment

The risk of modern slavery and human trafficking is noted in our Group Company Risk Register. The Risk Register is reviewed by our Executive Leadership Team and reported to our Board.

We believe that the greatest risk of modern slavery and human trafficking lies in our supply chain. Moving forward, we will utilise the supplier risk heat map to give us a more detailed understanding of our supply chain so we can more effectively work with suppliers in higher risk areas of the business.

5. Progress and effectiveness

As part of our continuous business improvement, we regularly review this statement and our progress against our modern slavery statement commitments to ensure that we continue to be compliant with the Modern Slavery Act and industry best practice. Our understanding of industry best practice in relation to the elimination of modern slavery and human trafficking comes from several sources including:

- Our Legal Team monitors industry publications so that we are fully across any proposed changes to the Modern Slavery Act.
- Our supplier audits give us an opportunity to discuss the issue with others in the industry.
- We are a member of the joint ESA (Environmental Services Association)/Slave-Free Alliance Waste Industry Working Group, which meets regularly to discuss the issue of modern slavery in the waste industry.

In 2021, we became a member of the Slave-Free Alliance. As a member, the Slave-Free Alliance we work directly with their advisors to help us identify the ways in which we can advance our modern slavery risk identification and prevention programme.

Cory's modern slavery and human trafficking prevention commitments are now under the remit of the Sustainability Working Group, which was formed in 2021. The Working Group is formed of [16] employee representatives from each of Cory's different functions and business units. The Working Group meet monthly and are responsible for ensuring that Cory's sustainability commitments are met.

6. Training

In 2021, in conjunction with the Slave-Free Alliance, we held a series of modern slavery awareness 90-minute workshops which were targeted at Cory managers and supervisors and those with a high level of interaction with higher risk suppliers. The workshops educated the business as to the risk of modern slavery and human trafficking in the waste sector and thus within Cory and its own supply

chain. The workshops also provided guidance on how the risk should be considered when selecting and engaging suppliers and what appropriate actions should be undertaken if a potential victim or issue of modern slavery and human trafficking is identified. The workshops were attended by around 60 Cory employees and the feedback on the workshops was very positive.

We also created and issued a modern slavery and human trafficking toolbox talk for the benefit of those who could not attend the workshops.

For 2022, we are in discussions with Slave-Free Alliance to hold further awareness workshops; including a refresher workshop which will be provided to the Cory Board of Directors.

7. Our ongoing, future commitments

From our progress and effectiveness reviews, we have identified the following ongoing and future commitments. We will:

- Continue to identify and evaluate the risks of modern slavery and human trafficking within our business and supply chain.
- Continue to audit our suppliers who work in industries that are most exposed to the risk of modern slavery and human trafficking. For example, our cleaning companies, clothing supply companies, and suppliers based outside the UK.
- Continue to check that our suppliers have a modern slavery statement, demonstrating a clear commitment to eliminating modern slavery and human trafficking.
- Continue to ensure transparency in our approach to tackling modern slavery throughout our business and supply chain.
- Provide broad procurement training to the business, which includes ensuring that the business understand the value and importance of working collaboratively with our suppliers.
- Continue to raise awareness of the risk of modern slavery within the Cory business, Cory supply chain, and the wider industry.
- Continue to raise awareness of our Modern Slavery Statement and supporting policies and standards and due diligence processes – in particular, our Whistleblowing Policy and Procedures.

8. Communication

This statement is communicated to all Cory employees and is made publicly available on our corporate website.

9. Board Approval

This statement was approved by the Cory Board of Directors on 28 March 2022.

Dougie Sutherland
Chief Executive Officer Cory Group

Statement dated 28 March 2022.