



Modern Slavery and Human Trafficking Statement





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Modern Slavery and Human Trafficking Statement

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and it is approved annually by the Board of Directors.

Indaver has a zero-tolerance to modern slavery and human trafficking. We recognise the harmful impact that modern slavery has on individuals and society. We are committed to preventing any form of slavery and human trafficking across all our operation and supply chain.

This statement sets out our actions to prevent modern slavery, and human trafficking relating to any part of our business for the year of 2023.

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ORGANISATION STRUCTURE AND SUPPLY CHAINS

Indaver is a reliable partner to both industry and public authorities for ecologically and economically responsible waste management. We are a European company with international ambitions. We are currently located in various countries: Belgium, the Netherlands, Germany, Ireland, United Kingdom, Italy, France, Portugal and Spain.

The Indaver organisation is defined as a Business Line driven organisation. Business lines are defined by the core markets in which they are active and reflect the strategic choices of Indaver as a group.

Within Indaver the following Business lines are identified:

- IWS-Industrial Waste Services, serving the EU industrial markets
- MSW Benelux, serving the local MSW market
- MSW IE/UK, serving the local MSW market
- Landfill Reconversion, managing existing landfills and developing new landfill projects

The Business Lines are supported by shared services, which consist of:

- Group departments represent a functional domain and as such set standards which are mandatory for the full group.
- International Shared Service Centres can be mandatory or voluntary.
- Country Shared Service Centres are active on a national or regional scale as these domains are dominated by national/regional aspects, e.g. legislation.

Indaver operates primarily in the waste sector across 9 different countries in 30 locations. We recognise that our volume and complexity of suppliers can present a risk of undetected modern slavery. We have identified 5 classification areas that we believe are higher risk within our operations:

The main supply chains of Indaver include those related to logistics, engineering, operation and maintenance, laboratory services, spare parts management and services from various suppliers both national and international.

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POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

At Indaver we are guided by our company values as stated in our company code. One of our values is transparency in communications and actions. Feedback and dialogue create a transparent climate that promotes sustainable relationships of trust and inspires cooperation.

Indaver's commitment to prevent Modern Slavery is outlined in this Modern Slavery and Human Trafficking Statement Policy and in our Supplier Code of Conduct.

Our Whistleblowing Policy and Procedure is available to all employees . Indaver encourages the reporting of breaches of our code of conduct or violations of the law especially issues relating to bribery and corruption, competition law, fraud, financial crime, product safety and quality issues, harassment and discrimination, international trade controls, protection of personal data, human rights and protection of individuals, serious environmental damage or conflicts of interest.

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DUE DILIGENCE PROCESSES

Indaver has a tough zero tolerance stance to slavery and human trafficking in its supply chains. The organisation has a number of procedures aimed at ensuring modern slavery and human trafficking do not take place in any part of our supply chain:

Prior to onboarding, all new goods and service providers are required to answer a series of questions in order to evaluate their compliance standards across health and safety, environmental impact, human rights (including modern slavery), and business ethics. Where standards are deemed to be inadequate, supplier applications are subject to further review.

Indaver maintains a Supplier Code of Conduct. Its main purpose is to ensure that all Indaver suppliers perform their activities ethically and in accordance with laws, regulations and the standards Indaver sets through its policies, guidelines and rules. This Code of Conduct provides a framework for responsible conduct when working with Indaver. Indaver suppliers should always strive to exercise good judgement, care and consideration in their daily work. Suppliers are also required to sign the Indaver Supplier Code of Conduct Supplier Charter confirming their compliance to our values.

Indaver audits vendors using risk based approach and records/follow up on any non-compliances (including breaches of the Modern Slavery Act 2015) or opportunity for improvements detected.

Besides the risk based audits that Indaver completes on suppliers, our organization is also audited by different authorities, our customers, and environmental inspections. Indaver and its services are audited also by Ecovadis, an international Supplier Assessment Platform used by many industrial companies worldwide to assess their suppliers on different aspects, including Social Responsibility & Slavery.

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INDAVER

RISK ASSESSMENT AND MANAGEMENT

Indaver completes an annual Management Review in which any concerns/ opportunities for improvements including Modern Slavery are identified/ discussed and form an action plan for the following year.

We complete a Strategic Risk Assessment on an annual basis where Modern Slavery risks are highlighted and mitigating controls reviewed.

Further management at a regional level is via a risk based approach.

We consider the Modern Slavery risk in our operations or supply chains as moderate and continue to remain vigilant for signs of such activities particularly in the areas of:

- Agency labour
- Construction
- Facilities management
- Industrial services
- Disposal

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MEASURING EFFECTIVENESS OF STEPS BEING TAKEN

At Indaver we assess the effectiveness of the measures being taken by monitoring, amongst other things, staff training, supply chain audit completion and verification and investigations into reports of modern slavery.

Dependent on risk, these measures are managed across the business units by a variety of management system tools namely balanced scorecards, annual management reviews, monthly site meetings plus internal and external audits.

Our COMPASS database tracks any supplier noncompliance through to resolution.

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TRAINING ON MODERN SLAVERY AND TRAFFICKING

Indaver has worked to increase awareness within our organisation to ensure employees have a level of understanding of the risks associated with modern slavery and human trafficking both in our business and our supply chain.

Online Modern Slavery training now forms a part of a comprehensive training package for new starters.

Next Steps:

In 2023/2024 we will conduct a review of our supplier audit process and our supporting management systems to ensure Modern Slavery governance throughout the organisation.

Signed on behalf of the Board,



Seamus Flynn

Managing Director 17th of August 2023

