

POLICY (IKMS)



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT POLICY

IKMS Reference Number: Modern Slavery and Human Trafficking

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Approval by SHE Department:

Applicable for location(s): Belgium, France, Germany, Ireland, Italy, Macedonia, Netherlands, Portugal, Spain, United Kingdom

Applicable for organizations(s): Indaver

Status of this document: Published in v5.0

Last revision date: 2022-08-30

Revision frequency: 4





Modern Slavery and Human Trafficking Statement Policy





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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 2022.

1



ORGANISATION STRUCTURE AND SUPPLY CHAINS

Indaver is a European company with international ambitions. We are currently located in various countries: Belgium, the Netherlands, Germany, Ireland and Britain, Italy, France, Portugal and Spain. The International Management Team (IMT), headed by the CEO, develops the strategy, sets down the annual targets and co-ordinates the operational activities.

Indaver offers solutions for waste management for public authorities and companies and is known and awarded for being a reliable partner in sustainable waste management and safely closing the waste cycle. It is our mission to recover as much raw material and renewable energy from waste as possible, in an energy-efficient manner and with the lowest possible CO₂ emissions and to the highest environmental and quality standards.

We are consistently led by environmental considerations and economically and socially responsible choices, which is why we invest in consultation and long-term relationships with all our stakeholders. This is how we lead the field in waste management and in sustainable business.

2

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Indaver is accredited to Quality Management Standard ISO 9001, Environmental Management Standard ISO 14001 and Occupational and Health & Safety Standard ISO 45001.

Our mission is the common thread that binds together all the choices that Indaver makes. It is formed in the five core values that drive our business.

- Demonstrating concern for people, safety and the environment,
- Building relationships based on mutual trust
- Transparency in communications and actions
- Concentrating on achieving results
- Continuously improving.

Within our organization, banning modern slavery in every form is part of our Code of Conduct and we also operate within a framework of principles and rules, described in the Local Work Regulations Policies, and the individual employee contracts. Therefore, we have several guidelines referring to this matter incorporated in our Policies, Procedures and Codes of practice including:

- QESH & Technical Competence Policy
- Indaver Code of Conduct
- Supplier Code of Conduct
- Young Persons Policy

3

DUE DILIGENCE PROCESSES

Indaver continues to make every effort to act ethically and with integrity in all our business relationships. We undertake all reasonable and practical steps to ensure that our standards are being implemented throughout the businesses of our suppliers.

All our vendors are part of the pre-qualification process and are only approved if they fully satisfy all Indaver requirements. Each vendor must sign the Indaver Conformity Statement and be familiar with the Indaver 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. The Supplier 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.

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

Besides regular 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. Indaver was awarded with a general “gold advanced” score.

4

INDAVER

RISK ASSESSMENT AND MANAGEMENT

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

We complete the Indaver Risk register on an annual basis.

Indaver has a centralised system for recording any non-compliances, both internal and external. We will assess any instances of non-compliance on a case-by-case basis and implement corrective and preventive actions.

We consider any Modern Slavery risk in our operations or supply chains as low and we have not detected any form of modern slavery and human trafficking in our operations and our suppliers during the period of this statement.

5



KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

Indaver maintains a Balanced Scorecard in which all Key Performance Indicators are reported by various business lines on a monthly basis. Additionally Indaver completes an annual Compass Report, which provides a comprehensive analysis and trends on data including any forms of non-compliances as well as analysis of the effectiveness of our root cause analysis (RCA) process and corrective and preventive actions implemented as a result of the RCA.

6

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.

It is part of our objective for the year 2022/23 to roll out a training programme for our employees, which raises awareness of how to spot the warning signs of any form of slavery and human trafficking.

Signed on behalf of the Board,



Seamus Flynn

Managing Director 17th of August 2022

