

Modern Slavery Act 2015:

Anti-Slavery and Human Trafficking Statement

INTRODUCTION FROM THE CHIEF EXECUTIVE OFFICER

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by FCC Environment (UK) Limited and its subsidiaries; FCC Environment Services (UK) Limited and Telford & Wrekin Services Limited, together known as the “Group” to prevent modern slavery and human trafficking in its business and supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to seek to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

ORGANISATION'S STRUCTURE

The Group is a key player within the municipal waste management sector, with over 60 Local Authority clients across England, Wales and Scotland.

The Group provides a diverse range of cost effective and sustainable waste processing, recycling, treatment, disposal and energy recovery services for Local Authority and private commercial customers. Annually, the Group receives, treats, recycles and disposes of approaching 10 million tonnes of household, commercial and industrial waste and manages around 200 waste management facilities. Through innovative solutions, the Group is committed to working with its Local Authority partners and industrial and commercial customers to respond to often complex and far-reaching waste management strategies, to meet the challenges of increased regulation from the UK and EU, and to improve upon waste management targets.

We are a part of the FCC Group, and our ultimate parent company is Fomento de Construcciones y Contratas, S.A. ("FCC"). FCC is a significant multi-national business with operations in Europe, South and Central America, Africa, the Middle East and the United States of America. FCC's principal activities cover Environmental Services (including waste management), Construction, Cement and Infrastructure.

OUR BUSINESS

FCC Environment (UK) Limited business in the UK comprises the following business activities;

- Recycling – comprising mechanical treatment plants ("MTP"), composting and household waste recycling centre ("HWRC") operations as well as several limestone quarries in Yorkshire;
- Green Energy – which manages EfW plants at Eastcroft in Nottingham (producing steam for the UK's largest district heating scheme), at Allington in Kent, Greatmoor in Buckinghamshire and North Hykeham in Lincolnshire (producing electricity for export). Green Energy is also involved in the planning for, or the construction of, a number of new EfW facilities in the UK following contract awards from Local Authorities;
- Waste Processing – comprising transfer station, landfill, hazardous waste treatment (including solid and liquid wastes) and clinical waste solutions; and
- Business Waste Solutions – which has UK responsibility for the collection of commercial and industrial and healthcare waste from the Group's business customers. This is to support the existing and planned infrastructure of the Recycling and Waste Processing activities.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to seeking to ensure there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We have undertaken due diligence checks of all suppliers in the form of ethical/compliance questionnaires and audits. We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and our contractors comply with our values, ethics and Policy, we have in place a supply chain compliance programme.

All suppliers (new and existing) must confirm conformance to our Code of Conduct and policy or, alternatively, confirm that they have policies of their own with which they comply.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided awareness training to our staff.

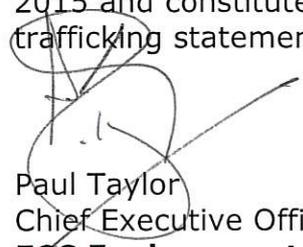
OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

We understand that Modern Slavery risk is not static, and we will continue to seek to mitigate the risks in the years ahead.

We will assess the effectiveness of the measures being taken by monitoring, inter alia, staff training, supply chain auditing and verification and investigations into reports of Modern Slavery

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes FCC Environment (UK) Limited anti-slavery and human trafficking statement.



Paul Taylor
Chief Executive Officer
FCC Environment (UK) Limited

Date: 29 November 2016