

Modern Slavery Statement 2024



Thalia
Waste Management

Contents

Introduction 3

About Thalia Waste Management 4

Thalia’s governance 4

Our policies 6

Our Supply Chain and Supply Chain Risks 7-8

Our recruitment and training 10

Thalia’s Key Performance Indicators 10

Thalia’s 2025 priorities 11



Introduction

Modern slavery includes the control, coercion, and exploitation of vulnerable individuals for economic gain. Data released by the Home Office at the end of 2021 noted that they were aware of 12,727 potential victims of modern slavery in the UK, (the highest number of referrals since records began in 2009) of which 43% (5,468) were children and 31% were British nationals.

At Thalia we do not tolerate any form of slavery, abuse, or exploitation. Thalia's Board of Directors is determined and committed to help eradicate human trafficking and modern slavery in all of its forms and we want to make sure our people are safe in an inclusive environment.

A handwritten signature in black ink, appearing to be 'Paco Hevia', written over a set of three horizontal lines.

Paco Hevia
Chief Executive Officer
Thalia Waste Management

About Thalia Waste Management

At Thalia, we deliver a range of environmental and waste management services. This includes waste collection, operation of household waste recycling centres, and waste treatment, including gasification and energy from waste facilities. We have many years of experience working with local authorities, communities, and businesses of all sizes across the UK.

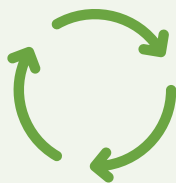
Our experienced waste teams help local authorities, businesses, and the communities we serve meet sustainability and environmental challenges. We provide cost-effective, comprehensive waste and resource management solutions while employing over 550 people across the UK.

Our first business focus is on Environmental, Social, and Governance (or ESG). We are committed to acting ethically, and with integrity in our business activities, and relationships. We also implement and apply effective systems and controls to make sure modern slavery does not happen anywhere within Thalia or across our supply chain.

At Thalia, we take a zero-tolerance approach to non-compliance with the Modern Slavery Act.



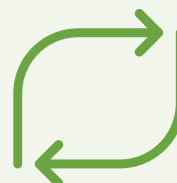
Reduce



Reuse



Recycle




Recover

Thalia's governance

Thalia Waste Management's Executive Team has responsibility for Thalia's approach to modern slavery. Together, we've created an action plan to reduce the risk of modern slavery occurring in Thalia and our supply chain. We have a modern slavery working group to review our approach to modern slavery, to co-ordinate the delivery of our plan, and our annual statement.

The group involves representatives from Thalia's Procurement, People Services, Business Improvement, and Legal functions.



*We'll have a strong
sense of responsibility,
and are accountable
for everything that's in
our power*

Our policies

Thalia's commitments are supported by our Anti-Slavery and Human Trafficking Policy [here](#).

Our modern slavery policy sets out:

- What modern slavery is
- How to identify potential instances
- How we prevent modern-day slavery
- How we detect this
- How we report

Our commitment to acting ethically and with integrity is supported by other policies guiding our people's behaviour, our recruitment process, our sourcing of goods and services, and our relationships.

These include:

- Business Ethics Policy
- Integrated Health Safety Environment and Quality Policy Statement and Management System Manual
- Whistleblowing Policy
- Procurement and Supply Chain Policy
- Recruitment & Selection Policy
- Inclusion Policy
- Employee Assistance programme
- Dignity at Work Policy

All our people have access to all Thalia policies. Information on these is also included as part of our people and supply chain onboarding process.

Our Supply Chain and Supply Chain Risks

Thalia recognises that managing an ethical supply chain is a fundamentally important obligation for the business.

Thalia has always worked hard to develop the quality of its supply chain of approximately 800 suppliers including providers of:

- construction services
- plant, vehicles, and equipment
- subcontracted and miscellaneous services
- contingent labour
- materials and manufactured goods

As part of the procurement and supply chain management process, we have several systems which evaluate prospective new suppliers as part of the onboarding process. Online pre-qualification question sets are hosted in Thalia's supplier-facing portal and are based on common industry standards and enable Thalia to gather detailed information about prospective supplier's business policies and procedures prior to them being engaged.

As part of this process, prospective suppliers and contractors are provided with detailed information about modern slavery including what it is, its impact on victims and survivors, how to respond to it and what Thalia's suppliers' and contractors' legislative obligations are. They are also asked to provide an anti-slavery and human trafficking statement which must define the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any part of its own business.

Thalia also asks suppliers and contractors to confirm that their staff, including labour agency staff, are paid at least the National Minimum Wage or National Living Wage as applicable.

In 2024, we launched a strategic programme to further invest in the business' professional procurement and supply chain management processes, structure and culture. Within it, considerable emphasis is being placed on enhancing Thalia's supplier pre-qualification processes including a significant focus on modern slavery.

This work [will continue during 2025 and] involves engaging with Unseen.uk who are acknowledged as subject matter experts in addressing the challenges of modern slavery in Thalia's (primarily UK) supply chain and were recommended to Thalia during discussions with the Ethical Trade Initiative.

Additionally, we are actively assessing the potential adoption of qualification standards which incorporate an independently accredited review of suppliers'/contractors' credentials in respect of modern slavery.

Thalia has several provisions within its standard contract model obliging suppliers and contractors:

- to confirm that none of their officers, directors or employees have been convicted of any offence or are subject to any investigation or enforcement proceedings involving slavery or human trafficking
- to ensure their own supply chains comply with all applicable modern slavery laws, statutes, regulations and codes
- to positively confirm their adherence to our Anti-Slavery and Human Trafficking Policy and allow Thalia to audit their activities and (where practicable) relationships, both routinely and if we have concerns about their compliance with any of our policies
- to train their employees to comply with their anti-slavery policy and keep appropriate records
- implement sub-contractor audits to monitor compliance with the anti-slavery policy to comply with any reasonable instruction from Thalia in relation to modern slavery obligations
- enabling Thalia to terminate its contracts with immediate effect, in the event of a breach of suppliers'/contractors' modern slavery obligations.

A man with short brown hair and a beard, wearing a yellow high-visibility shirt with reflective silver stripes, is shown in profile from the chest up. He is looking down and to the left, working on a piece of industrial machinery. The shirt has a logo on the left chest that says "Target Zero" with a circular icon above it. The background is slightly blurred, showing more of the industrial setting. The entire image has a semi-transparent blue and green overlay.

***We are dedicated
to building a
safe, inclusive,
and supportive
environment for
everyone at Thalia***

Our recruitment and training

We undertake pre-employment screening, including identity checks and confirmation of entitlement to work in the UK for all our people. These checks include regular ongoing review of bank accounts, next of kin, and home address for duplications, which are potential indicators of modern slavery. Where duplications are identified these are managed by Thalia's People Services team.

During 2024, Thalia implemented mandatory online (or e-learning) Modern Slavery training for all our people. The training explains what modern slavery is, who's at risk, how to spot the signs and how to report it. This training is supported by Ferrovia's compliance course which includes training on Ferrovia's supplier codes of ethics policy, due diligence for third-party integrity, and policy of the ethical channel, and for managing queries, complaints, and reports.

Across Thalia, our people can raise concerns by:

- Contacting their People Manager or an appropriate manager
- Contacting Thalia's Whistleblowing Helpline
- Using Ferrovia's Ethical Channel.

As part of our onboarding process, all new recruits receive a formal induction, where they are given access to Thalia's Anti-Slavery and Human Trafficking Policy and Whistleblowing Policy and are required to complete an online course on modern slavery.

Thalia's Key Performance Indicators

Thalia continues to review the measures implemented to prevent and combat modern slavery, such as training, supplier due diligence, and audits. Our main KPIs for ensuring the effectiveness of reducing the risk of slavery and human trafficking include:

- Employee completion of mandatory modern slavery training
- Percentage of suppliers using our procurement portal and having fully and satisfactorily completed the prequalification assessment.
- Targeted supply chain audits
- Actual and potential incidents raised through any of the channels provided.
- Screening for duplications in employee data (next of kin, bank details, bank addresses) as a potential indicator of modern slavery

Thalia's 2025 Priorities

During 2025, Thalia will:

- Hold quarterly Modern Slavery working group sessions to discuss our action plan and progress of key priorities.
- Continue to raise awareness of modern slavery to our people and supply chain and Thalia's whistleblowing process.
- Expand Thalia's existing supplier checks and improve supplier compliance with the onboarding process.
- When letting new contracts require its subcontractors to adopt a whistle-blowing policy that enables their people to blow the whistle on any suspected examples of modern slavery.
- Ensure quality assurance safeguards are in place to identify any potential infringement of its Modern Slavery Policy.

This statement is made under section 54(1) of the Modern Slavery Act 2015 and constitutes Thalia's slavery and human trafficking statement for the financial year ending 31 December 2024.

This statement applies to Thalia Waste Management Limited and its subsidiary companies. This statement has also been approved by the board of directors of Thalia WB ODC Limited and Thalia WB SPV Limited on today's date.



Paco Hevia
Chief Executive Officer
29th April 2025

**At Thalia Waste Management,
we see waste differently.**

Waste isn't just rubbish to us.

**We see waste as a resource to
be reused, recycled, or turned
into energy.**

**Together we're transforming
today's waste into tomorrow's
energy.**

Thalia.co.uk

Find our policies here:
thalia.co.uk/thalia-policies



[facebook.com/
ThaliaWasteManagement](https://facebook.com/ThaliaWasteManagement)



[linkedin.com/company/
thalia-waste-management](https://linkedin.com/company/thalia-waste-management)



[youtube.com/
@ThaliaWasteManagement](https://youtube.com/@ThaliaWasteManagement)

INVESTORS IN PEOPLE®
We invest in people Silver



Thalia
Waste Management