

**AUGEAN PLC**  
**MODERN SLAVERY STATEMENT**

Augean plc (“Augean”) is an AIM listed business registered in England and Wales (registered number 5199719). We are committed to acting ethically and with integrity in all our business activities and relationships. We are fundamentally opposed to slavery and committed to understanding the risk of it and ensuring that it does not occur anywhere within our business and its supply chains.

This statement is made on behalf of Augean pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) and constitutes our anti-slavery and human trafficking statement for the financial year ending 31 December 2016.

**Organisational structure, business and supply chains**

Augean is the parent company of a number of wholly owned subsidiaries which provide sustainable compliance-led waste management solutions for Britain’s more difficult to handle wastes. Augean has a workforce of approximately 400 people in the UK.

Augean operates a wide supplier base, including many contractors, consultants, companies and professional advisers.

**Policy in relation to slavery and human trafficking**

Overall responsibility for Augean’s anti-slavery initiatives is held by the Group General Counsel, Angela McGhin. Our Anti-Slavery and Human Trafficking Policy is available on request.

We have developed our Anti-Slavery and Human Trafficking Policy which states our commitment to acting ethically and with integrity in all our business dealings and relationships and to aiming to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

The Policy sets out what we expect from our staff and our aims for our suppliers and sets out a framework for reporting concerns or issues in this area.

We also operate a fully independent whistleblowing facility, which whilst not focused specifically on modern slavery, allows for a procedure for any employee or supplier to raise concerns or issues in confidence in this area.

**Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we are looking at how best we can implement and enforce effective systems and controls to, as far as practical, monitor potential risk areas in our supply chain and protect whistle blowers.

We hope that all those in our supply chain and contractors comply with our values, and we aim to develop a supply chain compliance programme to review this. This will include requiring all new suppliers, when completing our External Waste Controller Audit Checklist, to confirm their adherence to the Act.

## **Identifying assessing and managing risk**

Augean is based within Wales and England so our business activity takes place across the United Kingdom. As such, we have identified that the risk of modern slavery or human trafficking impacting our business or supply chain is comparatively low. Despite this, we have highlighted that there are some areas of our operations that are more vulnerable to modern slavery than others, particularly in relation to certain suppliers and sub-contractors for services. To address this specific risk, we plan to include a clause in our standard terms and conditions requiring suppliers and contractors to acknowledge our commitment to combat modern slavery and human trafficking and to meet our ethical standards in this area.

## **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 will be providing training to our employees on this area.

## **Our effectiveness in combatting modern slavery and human trafficking**

In order to measure how effective we are in ensuring that modern slavery and human trafficking is not taking place in any part of our business or supply chains we are:

- Reviewing our procurement and tender processes and procedures, so that they include references to modern slavery and human trafficking;
- Updating documentation to include specific reference to the Act to make clear our stance on this issue.
- Revisiting our Whistleblowing Policy and Codes of Conduct to ensure they remain fit for purpose in light of the Act's requirements;
- Improving the awareness of our employees, customers and suppliers regarding the Modern Slavery Act 2015, including what constitutes modern slavery and human trafficking;
- Requiring all key staff complete training to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains;
- Being aware of the risk of slavery and human trafficking within our suppliers and supply chains.

This statement will be reviewed annually.



**Stewart Davies**  
**Chief Executive**

1 June 2017