

Modern Slavery and Human Trafficking Statement

Financial Year 2025/26

This statement has been published in accordance with the Modern Slavery Act 2015.

1. Introduction

This Statement sets out the steps taken by CSWDC to prevent Modern Slavery and Human Trafficking throughout its business.

CSWDC is committed to improving practices to combat modern slavery and human trafficking. We have a zero-tolerance approach to modern slavery within our operations and strive to act ethically and with integrity to ensure modern slavery is not taking place in any part of our organisation or supply chain.

2. Our Commitment

CSWDC acknowledges its responsibilities in relation to tackling Modern Slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

3. Business Structure

CSWDC operates an EfW plant which is jointly owned by Coventry City Council, Solihull Metropolitan Borough Council, Warwickshire County Council and Leicestershire Council.

4. Definitions

The company considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction place on freedom of movement

5. Internal Policies

We aim to provide a rewarding working environment where people are valued and respected. We have a strong commitment to diversity, equity and inclusion and look after the wellbeing of our people, ensuring that they are safe and that we care for them appropriately.

Our policies and procedures aim to ensure that we create a safe and inclusive working environment for our employees. The policies and procedures in our Employee Handbook and internal intranet include:

- Whistleblowing policy
- Bullying and harassment
- Equality, Inclusion and Diversity Policy
- Recruitment policy
- Anti-slavery policy
- Anti-bribery policy

6. Suppliers

We have a responsibility to ensure that our suppliers have fair and ethical labour practices, and we are therefore committed to ensuring there is no modern slavery or human trafficking. The company will include in its terms and conditions or other contractual documentation a requirement for suppliers to adhere to this requirement.

We will continually review our contracting process and where appropriate to do so will include provisions to reflect the values set out in this statement and will monitor compliance.

7. Risk Assessment and Management

We consider there is a low inherent risk of modern slavery and human trafficking within our business. However, we take our responsibility to identify and effectively respond to any incidents of modern slavery and human trafficking very seriously.

We will continue to monitor any changes in the inherent risk levels of the goods and services in line with any updates to UK Government guidance.

8. Training

The company provides training to all employees to effectively implement its stance on Modern Slavery.

The training is delivered yearly through an on-line portal for all its employees and new starters.

9. Due Diligence

CSWDC carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place within its business or supply chains, including reviewing controls of its suppliers.

CSWDC, to its knowledge, has not conducted any business with another organisation which has been found to have involved itself with modern slavery.

10. Key Performance Indicators

We measure the success and continual improvement of our efforts in combatting modern slavery and human trafficking by a number of key performance indicators, as follows:

- Logging and monitoring the number of suppliers we have in order to continually understand our supply chain risks
- Logging and monitoring the number of formal accreditations obtained by our suppliers / contractors which are of relevance to combatting modern slavery
- Logging, monitoring and escalating any suspected instances of modern slavery (including through our whistleblowing policy)
- External assurance from industry experts, as required

This statement is approved by the Board of directors of The Coventry and Solihull Waste Disposal Company Limited on 14 July 2025 and will be reviewed and updated in accordance with the Modern Slavery Act 2015.

Karl Starkey
Managing Director
The Coventry and Solihull Waste Disposal Company Limited