

## Modern Slavery Statement

This statement has been published in accordance with s.54 of the Modern Slavery Act 2015. It is made by Stericycle for all of its business entities including divisions Shred-it and SRCL and outlines the steps taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain or not facilitated in any way.

As highlighted in our [2021 Code of Conduct](#), it remains a fundamental policy to conduct our business with honesty, integrity and in accordance with the highest ethical standards. We also remain committed to the ongoing review of our policies and practices to ensure we continue to meet the requirements of the Act and to uphold our highest ethical standards.

## Organisational Structure and Supply Chains

Stericycle is the UK and Ireland's leading compliance solutions provider delivering services for medical waste, sharps management, compliance, pharmaceutical waste, radioactive waste, and information destruction.

Being an ISO 9001, ISO 14001, OHSAS 18001 and ISO 27001 accredited organisation, Stericycle has in place robust and externally audited systems and processes to ensure its supply chain is managed in accordance with the law and best practice.

Stericycle's supply chain has thousands of suppliers engaged in activity. We are aware of the risks of modern slavery within the supply chain and have developed the Procurement Team's competence on the identification of these risks and the actions needed to mitigate or manage.

## Governance

Oversight and execution of our policies is managed jointly by Human Resources, Ethics Compliance team, Procurement, Social Responsibility, and Legal Department. Members of these functions have met as a team to review our policies, procedures and progress regarding the prevention of modern slavery.

## Risk of Modern Slavery

Modern slavery is a key topic specifically covered in our newly released corporate [Statement on Human Rights](#). We have in place policies and systems to ensure that we identify, assess and mitigate potential risk areas in our supply chains, source goods and services ethically, identify individuals being forced to work against their will and protect whistle blowers. Details of these policies and systems are set out below.

We consider the risk of slavery and human trafficking in our own labour and employment practices to be non-existent. We are a highly professional business with compliant global labour practices and policies which ensure that we continue to provide employment opportunities free from discrimination, modern slavery and human trafficking. A summary of our labour policies is set out below.

We recognise an increased risk within our supply chains as we are at least one step removed from our operations and labour practices for some goods we procure to deliver the services. However, our Procurement and Supplier Engagement Policy and methods for selecting suppliers greatly mitigate this risk. We recently launched a global [Supplier Code of Conduct](#), which will be shared with our suppliers and we expect them all to fully abide by it.

We consider that the steps we are taking, and continue to take, are effective in ensuring we are not exposed to modern slavery and human trafficking. We have several communication channels and mechanisms for reporting concerns (anonymously where permitted by law). All reports are formally triaged and investigated where necessary. Action is taken where appropriate.

## Relevant Policies

We have in place the following key policies across the group to support its strategy on modern slavery, ensuring we are conducting business in an ethical and transparent manner. These include:

1. **Employee Code of Conduct.** Our Code of Conduct is a reference guide — a place to seek clarity on the shared values and fundamental principles that define how Stericycle operates globally.
2. **Procurement and Supplier Engagement Policy.** Outlines requirements to ensure we operate consistent procurement practices for Stericycle globally.
3. **Modern Slavery Policy.** This policy sets out Stericycle's stance on modern slavery and explains how employees can identify it and where they can go for help.
4. **Recruitment Policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
5. **Suppliers Code of Conduct.** This global code was introduced during 2021 and explains the way in which we expect our suppliers to act.
6. **Reporting and Internal Investigations Policy.** This explains that our team members have a duty to report in good faith any violation or potential violation of the law or regulations, our Code of Conduct, or any internal policy or procedure, including matters of modern slavery. It also explains the company's duty to conduct appropriate investigations in a timely manner.

Raising concerns and asking questions are important ways we demonstrate our commitment to ethical conduct and protect each other and the Company. Individuals with questions or concerns can make reports using a telephone and internet/web-based reporting service (the Ethics Line) including anonymously, where permitted by law. Information on submitting a report may be found at: [www.stericycle.ethicspoint.com](http://www.stericycle.ethicspoint.com). Stericycle has a zero-tolerance policy on any form of retaliation against any team member who makes a report of misconduct in good faith or who cooperates in a company investigation.

## Labour Policy

Wherever possible, Stericycle employs team members directly. All recruitment is managed in accordance with a robust policy incorporating authorisation touch points. However, in the event the business needs to rely on agency support, it uses only specified, reputable employment agencies that have been approved through our supply chain management process to source labour.

Stericycle is a good employer and provides conditions of work that are of a high standard. We provide decent and fair conditions of employment in line with market rates aligned with the designated job role, which are paid directly to the employees, subject only to deductions permitted by law. Compensation for overtime is in accordance with prevailing laws and regulations and Stericycle respects the prohibition of mandatory / enforced overtime.

Stericycle also provides decent and fair conditions of work with regards hours of work, holidays, sickness, maternity / paternity protection and the ability to combine work with family responsibilities. Stericycle provides a work-life balance that is at least comparable to that offered by similar employers. Stericycle encourages all employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the organisation.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Stericycle respects freedom of opinion and expression, therefore the Reporting and Internal Investigations Policy is designed to make it easy for employees to make disclosures without fear of retaliation. Employees, customers and others who have concerns can use our confidential helpline/online service.

Stericycle does not engage in activities that infringe, obstruct or impede the economic, social and cultural rights of any person.

### **Procurement and Supply Chain Management Policy and Due Diligence Processes**

Stericycle will not support or deal with any business knowingly involved in slavery or human trafficking. We have zero tolerance for such activity in our supply chain. Our procurement activities encompass the planning and management of all activities involved in sourcing, procurement and logistics management. This includes coordination and collaboration with our partners, which can be suppliers, service providers and customers.

We ensure that all potential and incumbent suppliers are dealt with professionally, fairly and ethically and that we uphold the principles of sustainable procurement at all times. We favour suppliers that operate under recognised ethical codes of conduct.

In 2020, Stericycle expanded its corporate supplier/third party evaluation process to include a comprehensive screening of potential third-party ethics and compliance risk. This process includes the evaluation of new third parties used by Stericycle in all markets (except within the United State) against a corruption and adverse media database that monitors dozens of corruption topics, including child labour, human trafficking and modern slavery. For certain third parties identified as potentially higher risk, a more in-depth review of corporate owners/officials is conducted.

Prior to new suppliers being added to our supply chain in the UK, we have created a New Supplier Review Board, which are responsible for approving all potential suppliers onto our supply chain. To pass this stage gate, the requestors are required to provide detailed information of the suppliers following due diligence activity. This addresses areas such as accreditation, registration, insurance policies, director checks, financial risk analysis, human resource policies, ethical sourcing and supplier code of conduct, anti-bribery, quality systems, manufacturing inspection and testing, equipment maintenance, returns and complaints processes and internal audits.

During 2021 we plan to further rationalise our supply chain, to create an enhanced visibility within our supply chain's own supply chain to enable Stericycle to act quickly where any potential risks are identified.

### **Training**

We have conducted refresher training for the Procurement Team who are responsible for our supply chain so that they can recognise the signs of modern slavery or human trafficking and the appropriate action to take if they suspect that it is taking place within our supply chain.

As part of our commitment to eradicating modern slavery, we are members of the International Partnership for Human Rights Forum for Waste & Recycling Working Group, to drive a positive change to improve the human rights of workers in our supply chains.

Additionally, we intend to build on our knowledge and capacity in relation to slavery and human trafficking by ensuring that we target key areas of our business and partner with leaders within the "fight against modern slavery". Recognising we can continue to improve upon our existing processes and knowledge, we have engaged with Hope for Justice to provide awareness training with line managers that will take place during 2021. Partnering with this pioneering charity will undoubtedly enhance our processes moving forward.

Additionally, in April 2021 all team members globally undertook training of the 2021 New Code of Conduct, strengthening Stericycle's awareness and commitment to the Modern Slavery Act.

### **Our Performance Indicators**

We work in highly regulated sectors for a wide variety of public sector customers. The effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain will be known if no reports are received from employees, the public, our customers, regulators or law enforcement agencies to indicate that modern slavery practices have been identified.

**Plans for 2021/22**

1. Update Supplier Code of Conduct, ensuring it includes high-risk tier 2 labour suppliers.
2. Continue training programme to raise awareness of modern slavery with team members.
3. Rationalise supply chain to reduce potential risks from low spend suppliers.
4. Further enhance onboarding checks with new suppliers.
5. Join Slave Free Alliance to ensure we're part of the movement in eradicate modern slavery.

**Approval for this Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Stericycle's slavery and human trafficking statement as of June 2021.

**Name:** Dan Ginnetti, Executive Vice President International, Stericycle

**Signature:** 

**Date:** 23 June 2021