

June 2022 Update

Modern Slavery Act 2015 Statement

This statement has been published in accordance with s.54 of the Modern Slavery Act 2015 (“Act”). It is made by Stericycle for all of its United Kingdom business entities including the legal entities Shred-it Ltd and SRCL Ltd 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 [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 and ISO 14001 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 the Human Resources, Office of Ethics and Compliance, Procurement, Environmental, Social & Governance (ESG), and Legal Departments. 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 protect what matters.

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. The Code publicly affirms our commitment to compliance with the many laws, regulations, and other requirements that govern the way we operate and well as our commitment to the values and standard of behaviour to which we hold our team, specifically including the protection of human rights. The Code also provides information on how team members can report concerns.
2. **Procurement and Supplier Engagement Policy**. This internal policy outlines requirements to ensure we operate consistent procurement practices for Stericycle globally.
3. **Modern Slavery Policy**. This internal 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. This Supplier Code specifically indicates that Stericycle expects suppliers to abide by all applicable labour laws and regulations, including those governing workplace conditions, wage and compensation, and collective bargaining and free association. It also clarifies that suppliers must also avoid the use of child labour or labour sourced from organizations or individuals associated with human trafficking.
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. 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 and existing third parties used by Stericycle in all markets (except within the United States and Canada) against corruption and adverse media databases which includes approximately 1,000 agencies and almost 2,000 watchlists globally. These lists monitor dozens of corruption and enforcement 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. These evaluations are conducted and documented under the oversight of our Office of Ethics and Compliance.

In the UK, we have a New Supplier Review Board, which is 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. In addition, our Procurement Team is responsible for verifying the status of a supplier's Modern Slavery Statement and investigating the supplier's processes to manage its supply chain. These various process checks are documented as part of the onboarding processes for a new supplier with an electronic record stored in our supply chain management software.

Over 2021 and the first quarter of 2022, we executed a plan to rationalise our suppliers, which enhanced visibility into our supply chain's to enable Stericycle to act quickly where any potential risks are identified. As a result of this initiative, we removed approximately 10,000 vendors from our UK and Ireland supply chain.

Training

We conduct annual training among the Procurement Team who is responsible for our supply chain. The training focuses on enabling these individuals to 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

Additionally, in April 2021 all team members globally undertook training of the New Code of Conduct, strengthening Stericycle’s awareness and commitment to the Act. Team members who joined after this date undertook the training shortly after onboarding.

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 to Advance Prevention of Modern Slavery

In addition to a training program for our Procurement team, we plan to develop a modern slavery awareness training program which shall be targeted at our business and operational leaders who engage with suppliers plus our entire Human Resources team.

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 2022.

Name: Dan Ginnetti, Executive Vice President International, Stericycle

Signature:



Date: 28 June 2022