

Introduction

Wheelabrator Technologies Inc. (Wheelabrator) is committed to improving our understanding of, and our practices to combat, slavery and human trafficking.

This statement outlines the actions that we have taken and continue to take to ensure that our business and our supply chain are slavery free.

In this statement “**Wheelabrator**” refers to Granite Holdings Inc. and its subsidiaries in both the United States of America and United Kingdom, each of which has separately recognized and adopted this statement.

Organization’s structure and business

Wheelabrator Technologies is the second largest U.S. energy-from-waste business, and is an industry leader in the conversion of everyday residential and business waste into clean energy. Wheelabrator has a platform of 23 power-producing assets across the U.S. and U.K.—19 energy-from-waste facilities (three under construction), four independent power plants as well as four ash monofills and three transfer stations. Wheelabrator employs ~1200 people worldwide and currently has an annual waste processing capacity of over 7.5 million tons, and a total combined electric generating capacity of 853 megawatts—enough energy to power more than 805,000 homes. Wheelabrator also recovers metals for recycling into commercial products. The company’s vision *To develop, deliver and realize the potential of clean energy* speaks to Wheelabrator’s ongoing commitment to the development of clean energy solutions for its customers and local communities. Wheelabrator is owned by Energy Capital Partners, an energy infrastructure-focused private equity firm.

Procurement and Supply Chain

Wheelabrator has a zero tolerance to slavery and human trafficking at all levels of our Procurement and Supply Chain teams.

We have a dedicated internal Procurement and Supply Chain team who are responsible for the process of getting the goods and/or services to the WTI facilities in order fulfill its business model. Some of the tasks involved in Procurement include developing standards of quality, financing purchases, negotiating price, buying goods and physical inventory control. The Supply Chain consists of everybody involved in getting the needed products in the hands of the facilities. The Procurement and Supply Chain team implements a proactive rigorous evaluation process for all new suppliers, requiring them to demonstrate compliance with all relevant legislation and codes of practice including, but not limited to, health and safety of employees and suppliers, non-discrimination, bribery and corruption and modern slavery.

Once ‘preferred suppliers’ are appointed, Wheelabrator continues to monitor potential risk areas in our Procurement and Supply Chain on a proactive and ongoing basis. The process to which this occurs is through the Preferred Supplier Scorecard which is internally audited for full compliance with communication to the facility on any preferred supplier concerns.

Our policies on slavery and human trafficking

Wheelabrator's Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Wheelabrator also operate a whistleblowing policy so that all employees are able to raise concerns about practices within our business or supply chain, without fear of reprisals.

Training

In order to raise awareness of, and to ensure a high level of understanding of, the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our senior managers and all procurement and supply chain management staff.

This training includes:

- Introduction to Modern Slavery;
- Definitions of Modern Slavery;
- What to do if they spot signs of Modern Slavery in the UK or abroad.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the Wheelabrator anti-slavery and human trafficking for the financial year ending 31st December 2017

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Robert Boucher

President and Chief Executive Officer, Granite Holdings Inc.

Date: 27th March 2018