

# Modern Slavery and Human Trafficking Statement

## Introduction

This statement sets out Incentive FM Group Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

As part of the Facilities Management sector, the Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Group is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Group structure and supply chains

This statement covers the activities of operating businesses within The Incentive FM Group Ltd

### WHO WE ARE...

The Incentive Group of companies offers a true total facilities management solution unlike anything else in the market place today and single service delivery through Group Service Specialists. Our open book commercial structure and our ability to self-deliver all main services; cleaning, security, catering, maintenance and front of house, give us a unique position in the market place and regularly helps our clients save at least 15% from their facilities costs.

#### *Countries of operation and supply*

The Group currently operates in the following countries:

- Direct Service Delivery – UK
- Consultancy \_ EMEA Countries

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- The Group has a recruitment and vetting process in place for its direct operations in the UK which ensures a minimal risk of slavery or human trafficking.
- It's international operations are serviced by its UK based personal which also minimises the risk slavery or human trafficking.

#### *High-risk activities*

- The Group has not identified any high risk activities

#### *Responsibility*

Responsibility for the Group's anti-slavery initiatives is as follows

- **Policies:** Are developed by the Group HR department and monitored through its internal auditors and external assessment agencies such as the SIA, NSI and BSI.
- **Risk assessments:** The Group HR department has Group responsibility for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** The Group HR department has Group responsibility for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. They will bring any instances to the notice of the Senior Leadership Team.
- **Training:** The Chief Executive has responsibility for all training including slavery and human trafficking.

## Relevant policies

The Group operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy** The Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Group's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline.
- **Employee code of conduct** The Group's code makes clear to employees the actions and behaviour expected of them when representing the Group. The Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** The Group is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Group works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Group's supplier code of conduct will lead to the termination of the business relationship. Suppliers are periodically audited by our team of in house auditors to review compliance.
- **Recruitment/Agency workers policy** The Group uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Group works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Group's supplier code of conduct will lead to the termination of the business relationship. Suppliers are periodically audited by our team of in house auditors to review compliance.

## Due diligence

The Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Group's due diligence and reviews include:

- Communication of our zero-tolerance approach to Modern Slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and this is reinforced as appropriate thereafter
- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;

- conducting supplier audits or assessments through Group's own staff/third party auditors, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans
- participating in collaborative initiatives focused on human rights in general, and slavery
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## Performance indicators

The Group has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Group has:

- committed to ensuring all management and staff receive training on modern slavery
- reviewed supply chain in line with requirements of the Act

## Training

Training on this policy and on the risk our business faces from modern slavery in its supply chains forms part of the induction process for all individuals who work for us and regular training will be provided as necessary.

The Group's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Group;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the Group should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Group's supply chains.

## Awareness-raising programme

As well as training staff, the Group has raised awareness of modern slavery issues by circulating a series of emails to staff and the staff newsletter.

This explains to staff:

- the basic principles of the Modern Slavery Act 2015;
- how we can identify and prevent slavery and human trafficking;

- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Group; and
- what external help is available, for example through the Modern Slavery Helpline.

## Approval

This statement has been approved by the Group's board of directors who will review and update it annually.

**Director's signature:**

**Martin Reed**



**Chief Executive**

Incentive FM Group

**Date: September 2018**