

Modern Slavery and Human Trafficking Statement

Introduction

This statement is made on behalf of Incentive FM Group Ltd pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31st March 2021.

Structural Organisation

Incentive FM Group Limited comprising of:

- Incentive Facilities Management Limited
- Incentive QAS Limited
- Incentive TEC Limited
- Incentive Consultancy Limited
- Specialist Window Cleaning Limited
- Weston Electrical Services Limited (trading as Incentive Tec Limited)
- Incentive TEC Fire and Security Systems Limited

Our Business

We deliver facilities management services to a diverse group of clients cross the UK.

Our business model comprises of single or multi service delivery according to our clients' needs and requirements.

Definitions

The Organisation 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 of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Our Policies on Slavery and Human Trafficking

Our Anti-Slavery and Human Trafficking Policy and Supplier Code of Conduct reflect 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.

Commitment

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

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

Our Supply Chain

As a Facilities Management Group, our supply chain predominantly includes the sourcing of services principally from suppliers and other professional bodies.

We believe that there is limited risk of slavery and human trafficking taking place in our supply chains. Notwithstanding this, we are committed to ensuring that modern slavery or human trafficking is not taking place in our supply chain or in any part of our business.

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 Processes

As part of our initiative to identify and mitigate risk we have processes in place to:

- Deploy standard due diligence tools and processes to vet existing and new suppliers for negative news, litigation, regulatory enforcement actions and other adverse conduct. That process will address the vetting of suppliers for any reported incidents of engaging in slavery and human trafficking.

Supplier Adherence

We are committed to a zero-tolerance approach to slavery and human trafficking and we are committed to implementing and enforcing systems and controls to ensure human trafficking is not taking place in our business or our supply chains.

We expect our suppliers to share our commitment. Our Supplier Code of Conduct requires that suppliers not engage in slavery or trafficking of persons and is communicated to third party vendors, suppliers, etc. that we do business with at the time of contract negotiation. We expect our Suppliers to meet the requirements of our Supplier Code of Conduct.

Our Effectiveness

We do the following on an ongoing basis to ensure that slavery and human trafficking are not taking place in any part of our business or supply chains:

- Communication with companies in our supply chain to ensure understanding of, and compliance with our expectations.
- Monitor across our supply chains for incidents or allegations which conflict with our Supplier Code of Conduct.

Training

We provide training to employees to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business which includes but is not limited to:

- 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;

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic and as many staff were subject to furlough our requirement for additional temporary labour diminished. In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

Approval

This statement has been approved by the Board of Directors of the Incentive FM Group who will review it annually and update as required.

Director's signature:



Martin Reed

Chief Executive

Incentive FM Group

Date: March 2021