

Modern Slavery Statement

A) ORGANISATION

This statement applies to Facilicom UK which incorporates Facilicom Cleaning Services Limited and Trigion Security Services (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year January 1st to 31st December 2018.

B) ORGANISATIONAL STRUCTURE

Facilicom Cleaning Services Limited is the UK Cleaning Division and are a provider of managed commercial contract cleaning services operating within various industries and sectors including financial services, offices, manufacturing, educational institutions, retailing and hospitality. The organisation is a multi-site organisation spanning the diverse geographical locations throughout England, Wales, Scotland, Northern Ireland and the Republic of Ireland.

Trigion Security Services is the UK Security Division of the Facilicom Services Group. The Head Office is shared with Facilicom Cleaning Services; it operates throughout the UK, providing a range of Guarding and Electronic Security Systems Installation and Maintenance services to a full range of industry sectors at both local and national level. These sectors include financial services, offices, construction, manufacturing, retailing and hospitality. The labour supplied to its client base by Trigion Security Services Limited in pursuance of its provision of static guarding, mobile patrol, key holding, alarm response services and technical security are recruited from within the United Kingdom.

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The organisation has a centralised Head Office based in Sidcup, Kent a further UK office based in Manchester with an additional office in Dublin which covers our activities in the Republic of Ireland. The organisation is controlled by a Management Team.

Facilicom UK also has Group management in the form of a Board of Directors based in Holland and counterparts in Belgium. The labour supplied to its client base by Facilicom Cleaning Services Limited and Trigion Security Services Limited in pursuance of its cleaning services operations is recruited from within the United Kingdom.

C) DEFINITIONS

The Group 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

D) COMMITMENT

Facilicom UK is committed to its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015 and we have wholeheartedly welcomed its introduction. Facilicom UK understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Facilicom UK 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 Facilicom UK in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, Holland, and Belgium

E) SUPPLY CHAINS

In order to fulfil its activities, Facilicom UK main supply chains include those related to the provision of cleaning services to clients. Our product is our people and may include employees of diverse nationalities. Facilicom UK are committed to ensuring that we carry out the required checks on any employee's eligibility to work and all further administration relating to the employment of the individual such as payment of wages and registering of personal addresses. The company also procures the products and equipment for the pursuance of its own services.

Facilicom UK will ensure it is a consumer of products and services within the supply chain with suppliers or providers who are also committed to preventing the exploitation of hidden labour within its own organisation and supply chains.

F) POTENTIAL EXPOSURE

Facilicom UK considers its greatest exposure to the risk of slavery and human trafficking exists as the company employs a higher percentage of individuals from within and outside of the European Union whom upon entering and living in the UK may be at greater risk of exploitation. However, in general, Facilicom UK considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) STEPS

Facilicom UK carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Facilicom UK has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Facilicom UK has taken the following steps to ensure that modern slavery is not taking place:

Payroll and Finance

- Measures are in place to ensure that place of residence proof is checked via recent formal correspondence such as utility bills or bank statements (dated within 3 months) in order to identify any trends, i.e. multiple employees living at one address
- Obtaining proof of a personal bank account into which salaries/wages are paid in the form of bank statements or bank cards and checking that these are in the name of the individual employee
- Identifying any trends in the payments of salaries/wages into one bank account and investigating the circumstances thoroughly

Human Resources

- Engaged in training relating to the identification of hidden labour exploitation
- Engaged in training on checking eligibility to work documentation in line with UK Border Agency legislation in addition to proof of permanent residence and bank account details to reinforce the checks of other departments
- Creating action plans to address risk to modern slavery; namely; provide information on tackling 'Hidden Labour Exploitation' to our workforce in a variety of formats such as worker leaflets, induction, other training
- Designate appropriate managers to attend "Tackling Hidden Labour Exploitation" training and to have responsibility for developing and operating company procedures relevant to this issue
- Training on modern slavery is provided to all employees through our Academy online learning programme
- Responsible for vetting of employees to BS7858 standard as a minimum

Recruitment

- Accept that job finding fees are a business cost, and will not allow these to be paid by job applicants
- The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee
- Ensure that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and signs to look for and have signed appropriate Recruiter Compliance Principles
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members

Sales and Procurement

- Reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- Measures in place to identify and assess the potential risks in its supply chains
- Undertaking impact assessments of its services upon potential instances of slavery
- Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain, purchasing items on behalf of Facilicom to uphold this statement
- All those in our supply chain, purchasing items on behalf of Facilicom are fully monitored. They will be required to produce their own relevant statement and policy as part of our preferred supplier selection process due diligence, this also includes labour sub-contractors

Operations Management

- Review all documentation prior to processing by HR and Payroll departments in order to identify any trends in shared addresses or bank accounts within the workforce for all cases including the transfer of new employees via TUPE or individual new starters
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation
- Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately
- Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities through ongoing dialogue with our employees

H) KEY PERFORMANCE INDICATORS

Facilicom UK has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in Facilicom UK or its supply chains.

- Number of issues with procurement of organisations within the company supply chain
- Percentage of screened newly recruited employees passing without issues relating to living arrangements or bank account details
- Delivery of training on awareness and the tackling of third party hidden labour exploitation to all personnel responsible for recruitment, procurement or employee checks
- Annual review and update of the Modern Slavery Statement following the end of each financial year

POLICIES

Facilicom UK has the following document policies which further define its stance on modern slavery and all of which have been reviewed and amended as appropriate during the financial year ended 31st December 2018

- Facilicom UK Code of Conduct Policy FG-FP-004
- Facilicom UK Company Recruitment and Selection Policy FG-FPM-032
- Facilicom UK Equality and Diversity Policy FG-FP-005
- Suppliers Selection and Control Policy FG-FPM-046
- Suppliers Registration Form FG-FF-038
- Standard Conditions of Purchase FG-FF-156

I) SLAVERY COMPLIANCE OFFICER

Facilicom UK has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to Facilicom UK obligations in this regard. A confidential reporting line: 0208 308 5055 compliance@facilicomservices.co.uk.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.



Jan Hein Hemke
Managing Director
Approved by the Board 20th June 2019