



Atalian Servest Modern Slavery Statement
FY End 31 December 2019

Slavery and Human Trafficking Statement for the purposes of Section 54 of the Modern Slavery Act 2015

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1. A statement on the delay of publication due to COVID-19

Due to the impact of the COVID-19 pandemic, Atalian Servest Limited made the decision to postpone the publication of its modern slavery statement. This decision was the result of a variety of factors and was not taken lightly. The pandemic presented practical and logistical challenges to fulfilling the legal requirement to publish a compliant modern slavery statement, with significant business change occurring very rapidly and requiring resource and attention in order to ensure the financial stability of the business for the long term. The UK government's furlough scheme was heavily utilised by the business as a financial support mechanism, meaning that the resource needed to compile the modern slavery statement was unavailable for a sustained period of time. We were also concerned that the pandemic was likely to increase the possibility of worker exploitation in the ways highlighted below, and so a decision was made to apply the available resource to assessing and managing those increased risks in priority to previously planned activities. Our modern slavery statement for the financial year ended 31 December 2020 will provide detail on these risks, how they have been monitored and assessed, and how we have adapted our activities in response, but in summary they relate to:

Worker health and safety - we view the health and safety of our workers and third parties as paramount. During the pandemic, it was important to implement new measures to protect the health and wellbeing of our workers, and to guarantee payment of statutory sick pay (as a minimum) to aid in the prevention of the spread of the virus. These measures applied to both corporate and operational staff.

Supporting suppliers - we have been prioritising engagement with suppliers, including paying for orders already in production where possible. Late cancellations can lead to workers not receiving wages for work they have completed.

Whistleblowing and grievances - all workers needed to have constant access to grievance procedures to enable them to raise issues for resolution and to whistleblowing lines to report concerns. Our central function teams (such as IT and HR) had to implement new ways of facilitating those processes and procedures in a changed working environment.

Recruitment - we ensured that recruitment standards remained high to protect vulnerable workers. Maintaining rigorous checks during the recruitment process helped to protect staff from being exploited by third parties seeking to profit from heightened demand.

2. Introduction

Human trafficking, forced labour and other kinds of slavery and servitude are not tolerated within our own operations or within our supply chain. We are committed to improving our practices to combat slavery and human trafficking and to creating working environments in which fundamental rights and freedoms are respected.

In this statement, which relates to the financial year ended 31 December 2019, we report on our policies, practices and activities to prevent modern slavery, our successes and challenges (providing a practical case study) and the planned activity we have for the next financial year to improve and further enhance the effectiveness of our efforts.

This modern slavery statement is published by Atalian Servest Limited and its direct and indirect subsidiaries (together “Atalian Servest UK” for the purposes of this statement) in compliance with the Modern Slavery Act 2015.

3. Our Business

Atalian Servest UK is a provider of facilities management services and is an expert in creating environments that enable people to deliver exceptional experiences, helping organisations to be more efficient, effective and sustainable. Atalian Servest UK is part of the global Atalian Facilities Management Group, which has its head office in France.

We operate in the UK and the Republic of Ireland across a diverse range of sectors including construction, distribution, transport and logistics, education, healthcare, hotels, leisure and tourism, manufacturing, media, professional services, public sector and retail. We deliver a comprehensive portfolio of services including the design and installation of mechanical and electrical systems, technical services, integrated solutions, catering, security, and cleaning, allowing our clients to focus on their core business.

4. Our Supply Chain

Our supply chain includes a network of over 2,200 vendors. Whilst all our suppliers are based in the United Kingdom, we recognise the depth and complexity of supply that extends beyond our immediate Tier 1 suppliers, meaning that the chain has a global reach.

Procurement is a centralised function within the business. Purchasing activities are carried out by a UK procurement team supported by a Global procurement team (that controls strategic purchasing on behalf of the global Atalian group), which helps to bring consistency to the procurement process and works to ensure fair treatment of suppliers. The procurement process includes competitive tenders, supplier pre-qualification and vetting, and the central management of supply relationships allows for regular monitoring and management of suppliers.

We purchase a range of goods (from food products for use in our catering business, to chemicals, mechanical equipment and uniforms) and we purchase services from suppliers to whom we sub-contract certain elements of our operational solutions (such as waste management services). We have direct contractual relationships with all of our Tier 1 direct suppliers, and we work closely with them to assess their compliance with our policies.

5. Policies on Modern Slavery

We have implemented the following policies and controls to ensure slavery and human trafficking is not taking place anywhere in our business, including our supply chains. These policies were reviewed by the board of directors of Atalian Servest Limited and signed by Daniel Dickson, CEO, UK and Ireland

- CSR Policy (Reviewed June 2019)
- Anti-Slavery and Human Trafficking Policy (Reviewed August 2019)
- Ethical Procurement Policy (Reviewed September 2019)
- Recruitment Policy (Reviewed May 2019)
- Grievance and Whistle-Blowing Policies (Reviewed September 2019)
- Training Policy (Reviewed September 2019)

All reports of breaches or non-compliance with our policies are taken seriously and are fully investigated. Where appropriate, we always seek to take remedial action. The above policies can be provided upon request.

6. Due Diligence Processes

The following table illustrates the due diligence Atalian Servest UK has carried out over the last year in order to identify, prevent, mitigate and address the impacts of potential slavery and human rights issues in the UK business:

<u>Human Rights Due Diligence</u>	<u>Steps Taken</u>
<p>1. Identify</p> <p>How we assess actual and potential human rights impacts</p>	<p>Inside our organisation</p> <p>As a result of the modern slavery training received by our HR team and our managers, within the year a number of potential cases of modern slavery were identified and investigations were carried out.</p> <p>The outcome of these investigations were shared with the relevant operational teams and HR colleagues.</p> <p>Outside our organisation</p> <p>Due to the nature of our business, our operational colleagues are on the ground at a number of businesses. On a small number of cases our modern slavery trained colleagues were able to express concern of potential modern slavery risk with our clients who were able to launch internal investigations.</p>

2. Prevent

Integrating and acting on our findings

What we are doing as a business to prevent adverse impacts

What immediate action we have taken and our longer-term plans

What we're doing to ensure we do the right thing, and not make the problem worse

Inside our organisation

Communication of Modern Slavery App to all colleagues and enforce installation through IT

Outside our organisation

Within our supply chain PQQ, all new vendors are asked to subscribe to our Ethical Procurement Policy. This outlines what modern slavery is and signposts a number of resources to train and support where required.

3. Mitigate

Tracking Responses

What we identified are the root causes of the adverse impacts and our plans to address these causes

Inside our organisation

Ongoing review of our new starter process and documentation as part of our plans to improve the efficiency through continuous improvement

Outside our organisation

Sourcing our temporary agency staff through one reputable vendor to minimise risk

4. Account

How we address the impacts

Inside our organisation

Continue to update our internal training and resources by raising awareness through case studies.

Outside our organisation

Continue to communicate externally and raise awareness with the use of real case studies

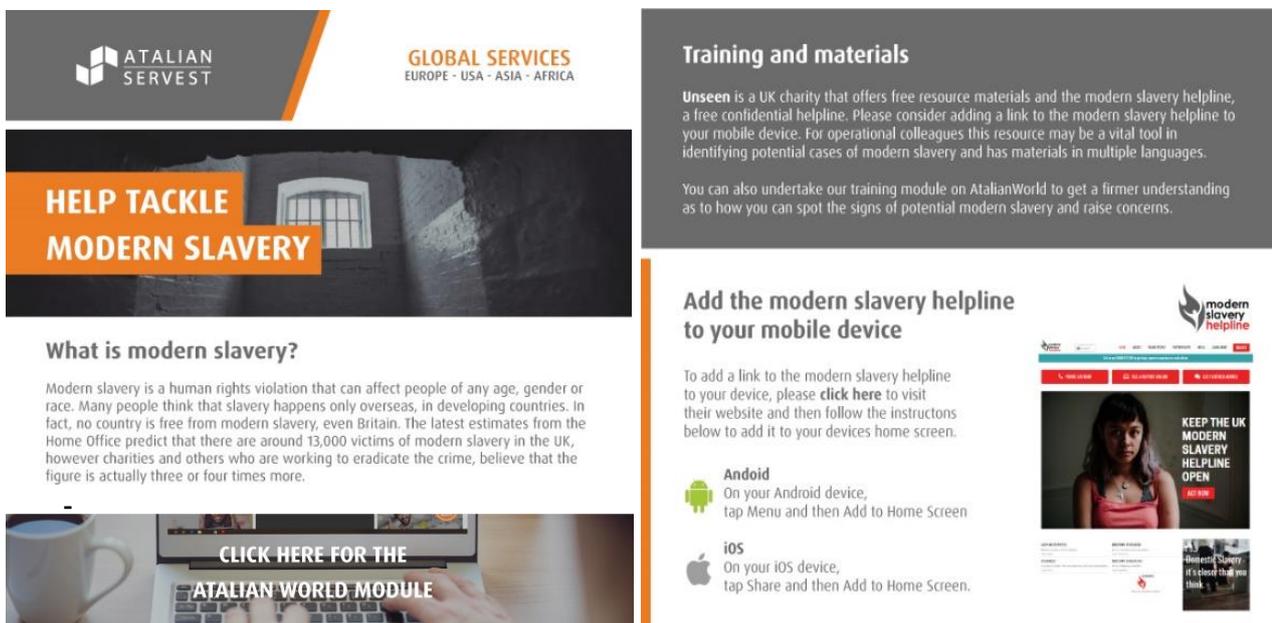
We have in place systems to manage risk:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains;
- protect whistle-blowers.

7. Training on modern slavery and human trafficking

As part of our continued commitment towards training colleagues on modern slavery we launched an internal communication campaign to:

1. Raise awareness of modern-day slavery
2. Outline the training available on the subject
3. Mobile Device Management will make to the download and installation of the modern slavery helpline mandatory on all Atalian Servest mobile devices



ATALIAN SERVEST

GLOBAL SERVICES
EUROPE - USA - ASIA - AFRICA

HELP TACKLE MODERN SLAVERY

What is modern slavery?

Modern slavery is a human rights violation that can affect people of any age, gender or race. Many people think that slavery happens only overseas, in developing countries. In fact, no country is free from modern slavery, even Britain. The latest estimates from the Home Office predict that there are around 13,000 victims of modern slavery in the UK, however charities and others who are working to eradicate the crime, believe that the figure is actually three or four times more.

CLICK HERE FOR THE ATALIAN WORLD MODULE

Training and materials

Unseen is a UK charity that offers free resource materials and the modern slavery helpline, a free confidential helpline. Please consider adding a link to the modern slavery helpline to your mobile device. For operational colleagues this resource may be a vital tool in identifying potential cases of modern slavery and has materials in multiple languages.

You can also undertake our training module on AtalianWorld to get a firmer understanding as to how you can spot the signs of potential modern slavery and raise concerns.

Add the modern slavery helpline to your mobile device

To add a link to the modern slavery helpline to your device, please [click here](#) to visit their website and then follow the instructions below to add it to your devices home screen.

Android
On your Android device, tap Menu and then Add to Home Screen

iOS
On your iOS device, tap Share and then Add to Home Screen.

modern slavery helpline

KEEP THE UK MODERN SLAVERY HELPLINE OPEN

Training continues to be given to all new starters, and HR workshops are devised to give specialist and tailored training to colleagues working in different areas of the business. An additional 54 manager completed our online training in 2019.

Each member of our Strategic Procurement team has passed the Ethical Procurement and Supply exam with the Chartered Institute of Procurement and Supply, which requires candidates to show a comprehensive understanding of the need to eradicate (and methods of eradicating) unethical behaviours, bribery, corruption and exploitation from an organisation's business and supply chain. This qualification forms part of our Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement Corporate Ethical Mark. we are one of 50 companies worldwide to achieve the accreditation. The accreditation demonstrates our commitment to integrity in supply management practices through the training and development of our procurement professionals to a high ethical standard, in addition to the adoption of the CIPS Code of Ethics. The Ethical Procurement and Supply accreditation focuses on issues including corruption, fraud, bribery, exploitation, and human rights abuses in supply chains. Organisations involved are facilitated in implementing strategic policy and creating a procurement environment in which best practice is carried out.

Wanting to reach the largest number of colleagues within the business, the internal communication shown above was sent to any colleague with an Atalian Servest email address.

Going further, we have set a target to have the modern slavery helpline or an equivalent app installed on all of our mobile device using our IT software to push out as part of an update. This target is to be achieved by the end of 2022.

8. KPIs to measure effectiveness of steps being taken

Measuring Effectiveness Point	Status
Continue to utilise the new Right Check Application and the implementation of its new Advanced HR Portal; unemployed candidate management, facial recognition, document validation results which ensures our hiring managers remain complaint when conducting right to work checks.	Our Right Check Application is now being used and has been rolled out across the business. Additional work needs to be carried out in order to roll use of this tool out to one of our subsidiaries, Atalian Servest AMK Limited, which is due to be carried out during 2020.
Investment is being made in a new enterprise resource planning system to provide greater efficiency in the way we operate and provide greater visibility of data. The forthcoming year will see the beginning of this change laying the foundations to new and innovative ways of working enabling us to deliver our services more effectively with transparency and consistency of processes.	Investment has now been made into our new enterprise resource planning system, Timegate. Timegate is currently being rolled out within Atalian Servest UK on a phased basis. The benefits of Timegate are that the system supports much more comprehensive data capture for colleagues clocking in and out and information on sickness, absence and holiday. In rolling out the system colleagues are now able to manage their own Timegate account, this alleviates some managerial control.
Ongoing Modern Slavery Training provided to our 'Ambassadors' who champion our workforce by providing support and who can speak representative languages (gaining trust of our fellow workers)	This objective has not been achieved in 2019 and will carry over to 2020.
Update our online Modern Slavery e-learning training module and resources for managers and colleagues	Our modern slavery e-learning course was updated to include more relevant case studies and information on the subject of modern slavery. Our continued efforts on communicating and driving modern slavery awareness within the business also saw two modern slavery communications go out to over

Measuring Effectiveness Point	Status
	<p>5,000 users signposting them to training and materials available online via Atalian World and also via Unseen UK.</p> <p>Our colleagues were also directed to install the Unseen modern slavery helpline app to their mobile devices.</p> <p>An additional 54 manager completed online training in 2019.</p>
<p>Reporting of all cases identified and tracking progress and identifying improvements</p>	<p>Each potential modern slavery case is captured on our ESP HR system. When Atalian Servest UK is notified of a potential case of modern slavery it is added to the system and relevant people within the business are notified including our HR Director, the relevant HR Business Partner and the CSR team. In cases that appear to pose a significant risk to the individual external advice is requested and their advice acted upon.</p> <p>The process of each case and the outcome is recorded and the HR support team and all involved are provided with a debrief.</p>
<p>Human Rights Policy – Publish our Human Rights Policy in support of our commitment to ensure modern slavery does not exist in our business and supply chain.</p>	<p>Atalian Servest UK reviewed this commitment in 2019 and reviewed three policies to cover Human Rights. We reviewed our Anti-Slavery and Human Trafficking, Dignity at Work and Ethical Procurement policies which were communicated via our Company intranet.</p>
<p>Provide access to our e-learning Modern Slavery training module publicly on our external website.</p>	<p>This objective has not been achieved as, after review, it was determined to be unviable due to licencing issues. It will be removed as an objective.</p>
<p>Further promotion of our Insurance Protection Scheme available to all colleagues providing access to an Employee Assistance Programme</p>	<p>Further promotion of our Insurance Protection Scheme, delivered through HSF, was communicated to the business in November 2019.</p> <p>The HSF assistance plans, if colleagues wish to join, include unlimited access to a variety of</p>

Measuring Effectiveness Point	Status
	<p>assistance helplines and services which are available to all policy holders and their families. Benefits include:</p> <ul style="list-style-type: none"> • GP telephone advice – 24-hour access to a doctor • Virtual doctor – a webcam based face-to-face consultation service with a doctor • Counselling service – a telephone and, if needed, a face-to-face counselling service • A legal helpline – offering telephone access to solicitors and barristers
<p>Invite our key stakeholders on our supply chain to Modern Slavery seminars to raise awareness and experience share through collaboration with our key stakeholders towards minimising the risks and increasing due diligence.</p>	<p>This objective has not been achieved in 2019 and will carry over to 2020.</p>
<p>Continue with our progress towards becoming a “Stronger Together” Business Partner.</p>	<p>This objective has not been achieved in 2019 and will carry over to 2020.</p>
<p>We will develop a system to track the number of suppliers evaluated at pre-qualification stage for compliance with the Modern Slavery Act 2015, monitor the number of existing suppliers who have been assessed for compliance with our Ethical Procurement Policy and to record the outcome of such assessments.</p>	<p>Atalian Servest UK wants its clients to be confident that the individuals who make its products are treated fairly, with respect for human rights and are not exposed to unsafe working conditions. The business believes that when ethical standards are in place, improvements can be made to worker well-being, productivity and quality, which benefits both the suppliers and clients. Only suppliers that share Atalian Servest UK’s standards and values will be considered appropriate to trade with Long-term trading relationships with suppliers are built on the principle of fair, open and honest dealings always.</p> <p>In line with this commitment, Atalian Servest UK requires each supplier to sign up and adhere to our Ethical Procurement Policy at pre-qualification stage.</p> <p>Since January 2018, 338 suppliers have signed up to our Ethical Procurement policy. 91 of these were in 2019.</p>

9. Case study on tackling modern slavery

In April 2019 a member of Atalian Servest UK's HR team provided an update on Brexit to the managers on one of our customer sites, during which it was identified that a significant percentage of our workforce on that site were EU Nationals. When discussing the resources and information available to cascade to the workforce in relation to what they need to know and do about obtaining their settled status, the managers flagged concern with regards to the language barrier as the majority of the workforce did not speak or understand English. Following further discussion about the make-up of our workforce on site, certain risk indicators were identified that pointed to a potential risk of modern-day slavery, such as:

1. two labour agencies were used to provide the workers on site;
2. workers were identified as living together and travelling to and from site by minibus;
3. the labour agencies conduct all the training which they translate into their preferred language; and
4. the workers were all predominantly Eastern European and looked to arrive in localised groupings.

Following the identification of the above risks, we concluded that the signs were typical of potential modern slavery and took action to further understand and mitigate the risks.

Upon our internal investigation taking place, we identified 7 individuals all living at the same address (potential victims) and so attended site to speak to the relevant individuals.

Atalian Servest UK's procurement team interrogated the records held in relation to the two labour agencies supplying workers to the site, and the CSR team contacted the Modern Slavery Helpline to inform them of the incident and request further advice.

The personnel files for each of the 7 individuals were reviewed and our HR colleague was satisfied that all the relevant paperwork was correct and in order. Through continued dialogue it is understood that house sharing within the relevant geographical area is common practice due to the cost of living (being an affluent area). We were advised that this particular address was previously a care home that has been modernised into individual flats. There are now no concerns over the addresses.

To satisfy the concern over modern slavery issues we audited a selection of files from the labour agencies, and in addition we reviewed all aspects of the recruitment process used by the agencies.

It was confirmed that the agencies had Compliance teams who liaised with the GLAA to carry out checks on addresses if they had a number of people registered at the same address.

Following our investigation and conversations with the Modern Slavery Helpline, we determined that there was no modern slavery activity within the contract.

10. Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Atalian Servest UK's slavery and human trafficking statement for the financial year ending 31 December 2019. It was approved by the board of directors of Atalian Servest Limited on 22 September 2020.



22nd September 2020

Daniel Dickson

Date

Chief Executive Officer UK and Ireland