



Modern Slavery Statement
For year ending 31 December 2021

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

Contents

1. Introduction.....	3
2. Our Business	3
3. Our Supply Chain	3
4. Policies on Modern Slavery	4
5. Due Diligence Processes.....	4
6. Training on modern slavery and human trafficking.....	6
7. KPIs to measure effectiveness of steps being taken.....	8
8. Identified Incidents	10
9. Approval	10

1. 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 2021, we report on our policies, practices and activities to prevent modern slavery, our successes and challenges 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. Atalian Servest Limited’s direct and indirect subsidiaries are Atalian Servest AMK Limited, Atalian Servest Food Co Limited, Atalian Servest Managed Services Limited, Atalian Servest Security Limited, Atalian Servest Pest Control Limited, Thermotech Solutions Limited, Fire and Air Services Limited, Ensco 1194 Limited, Thermotech Fire Protection Limited, Thermotech Mechanical Services Limited, Oakwood Technology Group Limited and Oakwood Air Conditioning Limited.

2. 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.

3. Our Supply Chain

Our supply chain includes a network of over 2,200 vendors. Whilst all our suppliers are based in the United Kingdom and the Republic of Ireland, 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.

4. 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:

- CSR Policy
- Anti-Slavery and Human Trafficking Policy
- Ethical Procurement Policy
- Recruitment Policy
- Grievance Policy
- Whistleblowing Policy
- Training Policy
- Code of Business Conduct

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.

5. 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:

Human Rights Due Diligence

Steps Taken

1. Identify

How we assess actual and potential human rights impacts

Inside our organisation

As a result of the modern slavery training received by our HR team and our managers, if suspected cases of modern slavery are identified then investigations are carried out. The outcome of these investigations are shared with the relevant operational teams and HR colleagues.

We run regular checks on bank account details submitted by our colleagues for payroll purposes to check for accounts being used by more than one individual and, similarly, we run regular checks on residential addresses on file for our colleagues to identify situations where more than one colleague is residing at an address. Should these checks raise red flags then the relevant manager is alerted and the matter is investigated.

Outside our organisation

Due to the nature of our business, our operational colleagues are on the ground at a number of businesses. Our colleagues are trained to recognise red flags that can then be shared with the relevant client.

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.

Mandatory training on modern slavery and human trafficking via our e-learning platform.

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.

Our standard terms of purchase require our suppliers to comply with all applicable laws, including the Modern Slavery Act 2015.

Our supplier due diligence process includes checks (run via the SafeContractor scheme) to ensure that all relevant suppliers have issued a modern slavery statement.

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 as few reputable vendors as possible 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.

6. Training on modern slavery and human trafficking

As part of our continued commitment towards training colleagues on modern slavery we run internal communication campaigns such as the one illustrated below to:

1. Raise awareness of modern-day slavery
2. Outline the training available on the subject
3. Inform our colleagues of our Mobile Device Management programme, which makes the download and installation of the modern slavery helpline mandatory on all Atalian Servest mobile devices

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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.



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.



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.

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. 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 set a target to have the modern slavery helpline or an equivalent app installed on all of our mobile devices by the end of 2022, using our IT software to push out as part of an update.

7. KPIs to measure effectiveness of steps being taken

Measuring Effectiveness Point	Status
<p>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.</p>	<p>Our Right Check Application is now being used and has been rolled out across the business.</p>
<p>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.</p>	<p>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.</p>
<p>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)</p>	<p>Comprehensive e-learning modules have been made available to our Ambassadors as an initial step, with additional training and support planned.</p>
<p>Reporting of all cases identified and tracking progress and identifying improvements</p>	<p>Each potential modern slavery case is captured on our 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 Head of HR, the Legal 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>

Measuring Effectiveness Point	Status
<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 2020 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>Further promotion of our Insurance Protection Scheme available to all colleagues providing access to an Employee Assistance Programme</p>	<p>Our Insurance Protection Scheme, delivered through HSF, is periodically communicated to the business via central email communication and via our manager network.</p> <p>The HSF assistance plans, if colleagues wish to join, include unlimited access to a variety of 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 2021 due to the continuing impact of the covid pandemic and will carry over to 2022.</p>
<p>Continue with our progress towards becoming a “Stronger2gether” Business Partner.</p>	<p>Members of our HR team attended Stronger2gether workshop training days in 2021.</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</p>

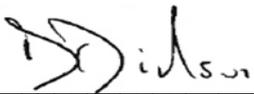
Measuring Effectiveness Point	Status
	<p>values will be considered appropriate to trade with Long-term trading relationships with suppliers are built on the principle of fair, open and honest dealings always.</p> <p>In line with this commitment, Atalian Servest UK requires each supplier to sign up and adhere to our Ethical Procurement Policy at pre-qualification stage.</p>

8. Identified Incidents

No incidents (i.e. suspected cases that after investigation were assessed as requiring onwards reporting) were identified in our business or our supply chain during 2020.

9. Approval

This statement is approved by the board of directors of Atalian Servest Limited and is made pursuant to section 54(1) of the Modern Slavery Act 2015, constituting Atalian Servest UK's slavery and human trafficking statement for the financial year ending 31 December 2021.



Daniel Dickson

Chief Executive Officer UK and Ireland

Date: 21 April 2022