

MODERN SLAVERY STATEMENT



HR14 REV 4 - MAR 2021

MODERN SLAVERY STATEMENT

1.0 OBJECTIVE/COMMITMENT

This policy statement applies to Andron Contract Services Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2020/2021.

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 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 at least the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

2.0 ORGANISATIONAL STRUCTURE

The Organisation specialises in the provision of cleaning, security and facilities management services of the highest quality to an array of high profile clients throughout the U.K. We have a reputation for excellence and our employees are recognised as amongst the most experienced and dedicated in the facilities management sector.

The labour supplied to the Clients in pursuance of its operation is wholly carried out in the United Kingdom.

The Organisation is controlled by the Board of Directors encompassing, Ron Stewart Jnr, Derek Stewart, Paul Orru, Andrew Harper and Cheryl Stewart.

Our regional offices are currently located as follows:

- Head Office, Aberdeen - In this office we house the support services functions such as Accounting, Finance, Payroll, Human Resources and HSEQ departments. Our regional operations team at Head Office service many of our longest standing clients shopping centres and offices in the city centre to various retail banking sites in town and rural areas, our coverage stretches from the Central Belt to the far North of Scotland.
- Regional Office, Cumbernauld - From our regional Office in Cumbernauld we cover the large area from Dundee in the North to Carlisle in the South, governed by a designated Regional Manager. Our Cumbernauld office currently houses our security operation base for Scotland and is also the main base for our Marketing, Tendering and Bidding departments.
- Regional Office, Warrington - Our regional office in Warrington is the main hub for the Helpdesk and

Commercial departments and houses additional HSEQ resource for England. Operational contracts spanning the area from the far North of England to the South and Wales are also managed via this office. This regional office houses the vast majority of the operations team and is headed up Operations Director. This region is split into three areas:

- Retail and Banking accounts governed by a designated National Account Director.
- JLL account and the central London area, governed by a designated National Account Director.
- North of England, Midlands and South areas, governed by a designated Regional Manager.

3.0 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

4.0 SUPPLY CHAINS

Where subcontractors are engaged to undertake work for or on behalf of the Organisation, it is our policy to establish that they are competent to undertake the work safely before they are appointed and also to ensure the work is carried out safely at site through permissions to work and monitoring. To this end, the Organisation has created a policy and guidelines Control of Contractors Policy and Guidelines - PUR 258, to ensure compliance with the common law duty of care placed on employers to ensure only competent contractors are engaged.

For all subcontractors appointed directly by the Organisation, we will undertake checks of their compliance in a proportionate manner, according to the risks of the job. The appraisal assessment also evaluates the potential subcontractor employees; technical skills, experience, training certificates/ records and suitability for the work to be done.

Before placing a subcontractor on to our approved list we review the HSE's notices and prosecution database to determine if the potential subcontractor has been subject to any formal legal sanction.

Annually we reassess aspects of competency including that they continue to hold registrations etc. and their health and safety performance is acceptable.

Whilst on site, the Organisation will manage contractors in a controlled and structured way that will reduce health and safety risks of the contract activity, ensuring that they are qualified for the job, understand what is required and have open communication and they clean up after themselves. This will also reduce disruption and ensure better quality of workmanship, which will benefit everyone.

A general permission to work is completed by both parties and a site induction carried out before work can commence. The Organisation will have received by this point all relevant documentation including site specific risk assessments and safe working methods, & training records. Permits to work will be

issued for high risk activities which includes working at height using Permit to Work Guidance - PUR 264 documentation.

Routine monitoring of the work will be carried out to ascertain the quality of the workmanship, whether the subcontractors have followed the safety rules and carried out what is required.

5.0 POTENTIAL EXPOSURE

In general, the Organisation 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.

6.0 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 welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted delay, the Organisation remains in a position to publish its statement for the financial year 2020/2021 in line with the original publishing requirements.

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, which is as set out under 5.0 POTENTIAL EXPOSURE above.

The Organisations use of suppliers changed due to the nature of the operational tasks that were being carried out during the pandemic i.e. deep cleans, however the process as detailed in 4.0 SUPPLY CHAIN continued to be strictly adhered to.

Furthermore, homeworking was swiftly implemented in March 2020 for the Head Office and Regional Offices which meant that its premises, from which it usually conducts day to day business, were temporarily closed. Approximately two thirds of our workforce were placed on furlough as a result of the drop in demand for our services in certain sectors, predominantly retail, meaning there were no additional temporary labour needs.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group 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.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

7.0 STEPS

The Organisation 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.

The Organisation 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, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- We review supplier appraisals and method statements for all work carried out. This includes risk assessments.
- Undertaking impact assessments of its services upon potential instances of slavery.
- Creating action plans to address risk to modern slavery when required.

8.0 KEY PERFORMANCE INDICATORS

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

- We are currently in the process of requesting every subcontractors' Modern Slavery Statements.
- We will review their compliance of employment methods.
- We will review what actions we require our subcontractors to take and enforce improvement notices where possible.
- Those who do not comply we will look to terminate these commercial contracts.

9.0 POLICIES

The Organisation has the following policies which further define its stance on modern slavery:

- Equal Opportunities Policy
- Equal Pay Policy
- Harassment Policy
- Dignity at Work Policy
- Ethics and Diversity Policy
- DBS and Safeguarding Policy
- Corporate Hospitality and Gifts Policy
- Whistle Blowers Policy
- Quality, Health and Safety, Environment Integrated Management Policy

Through our accreditations of the following external audit of national and international standards: ISO 9001 Quality Management; ISO 14001 Environment Management; ISO 45001 Health & Safety Management; ISO Energy Management

ISOQAR Safe Contractors Accreditation

Internal Audits: We have established a comprehensive programme of management system audits to verify that all processes comply with ISO9001, ISO14001, ISO 45001, ISDO 50001 and Company policies. The audits are conducted in accordance with management system procedure.

Arrangements have been established for the reporting, review, resolution and recording of non-conformities. These arrangements include non-conformities with significant safety, environmental, quality and regulatory implications, the identification of root causes and actions to prevent reoccurrence.

External Audits: Independent assessments are carried out bi-annually to determine the extent to which the Integrated Management System's requirements are fulfilled. They are carried out by either the regulators such as the HSE or Certification Organisations.

Certification bodies carry out routine external audits against applicable requirements of ISO 9001, ISO 14001, ISO 45001 & ISO 50001.

10.0 TRAINING

The Organisation provides external online training to staff to effectively communicate the Organisation's policy and to further implement its stance on modern slavery. The online training is refreshed annually and verified by undertaking a short assessment upon completion for which an online certificate is issued.

11.0 SLAVERY COMPLIANCE OFFICER

The Organisation has a Slavery Compliance Officer within the Human Resources Department, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of Approval: 30th March 2021

Signed:



Managing Director

Date Signed: 30th March 2021