

MODERN SLAVERY STATEMENT



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1.0 Context

The Modern Slavery statement has been published in accordance with the Section 54(1) of the Modern Slavery Act 2015 for the financial reporting period 2022/23 which sets out the approach being taken by Andron Facilities Management to prevent the risk of modern slavery and human trafficking in its business and across the supply chain.

2.0 Our Commitment

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

Andron FM does not enter into business with any other organisation, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to Andron FM in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. We strictly adhere to at least the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceed those minimums in relation to its employees.

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

The statement provides the following:

- Organisational Structure
- Potential Exposure
- Steps
- Due Diligence in relation to our supply chain
- Policies
- Training
- Reporting a Concern

3.0 Organisational Structure

Andron FM 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. Andron FM was first established in Aberdeen, our Head Office is located in Dyce, whilst we also have regional offices in Warrington, Cumbernauld and London. As a growing family business, Andron FM has approximately 2500 employees and facilities management services across the real estate, banking, public, retail, and manufacturing & distribution sectors, across the UK.

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

4.0 Potential Exposure

Andron FM considers its exposure to slavery and 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.

5.0 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.

Andron FM 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 your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- reviewing supplier Modern Slavery Statements via Fixxbooks
- measures in place to identify and assess the potential risks in its supply chains;
- any actions taken to embed a zero tolerance policy towards modern slavery

6.0 Due Diligence in Relation to Our Supply Chain

Andron FM has a supplier onboarding tool in place, Fixxbooks. The Fixxbooks system manages our requirements for approval to work for Andron FM and contractor agreements. We recognise that we need to take precautions throughout the supply chain to prevent any issues from arising. The Control of Contractors Policy sets out the process for vetting the contractors Andron FM works with. The below steps are taken as part of the supplier onboarding process:

- New contractors, who have been approached by either an Operations Manager or Client to do work at a certain site or sites are sent an invitation via e-mail.
- The contractor is given access to Andron's sign up page on Fixxbooks' web site.
- Once the questionnaire is completed by a subcontractor and submitted together with all required documentation, the application is checked for suitability, in a proportionate manner, according to the risks of the job.
- The assessment process evaluates the potential contractor's technical skills, experience and suitability for the work to be done. The type of information which will be requested for review includes (as appropriate to the work and scale of a project): -
 - The Company's safety management structure & qualifications
 - Health and safety policy
 - Environmental policy
 - Experience in similar contacts / references from previous clients
 - Membership of reputable trade bodies or approved contractor schemes
 - Skills and qualifications of staff (copies of training certificates)
 - Legally required registrations and licences (e.g., Waste carriers' licence)
 - Selection processes of sub-contractors
 - Health & safety performance (number of accidents, serious incidents, enforcement action)
 - Public liability insurance certificate
 - Example of method statements & risk assessments for similar work

If the application and documentation is approved, the company will be accepted and put on the approved contractor list. Prior to placing a contractor on to our approved list, the HSE's notices and prosecution database (<http://www.hse.gov.uk/enforce/index.htm>) will be seen, to determine if the potential contractor has been subject to any formal legal sanction. Plus, any claim that a contractor has a particular licence or registration is verified directly with the scheme in question.

7.0 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
- Control of Contractors Policy

8.0 Training

The Organisation provides external online training to Head Office employees 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 and a certificate is issued. We believe that awareness is one of the most effective ways to reduce the risk of modern slavery and with the awareness of both our employees and suppliers we aim to ensure that there is no opportunity for this to occur. We plan to increase the awareness of modern slavery and aim to have all of our employees complete the modern slavery e-learning.

9.0 Reporting a Concern

The Organisation has a Slavery Compliance Officer, Hannah Richmond, HR Business Partner 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. The Slavery Compliance Officer undertakes annual Modern Slavery training. Any concerns should be emailed to hradmin@andron.co.uk

Signed:



Ron Stewart
Managing Director

31st January 2024