

Modern Day Slavery Statement

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that ABM Group UK has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ABM Group UK has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Policies on Slavery and Human Trafficking

ABM Group UK is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or our supply chain. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

ABM Group UK has the following internal policies to ensure that it is conducting business in an ethical and transparent manner:

- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, and agencies on approved frameworks which are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will
- Equal Opportunities. We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals
- Standards of business conduct. This code explains the way in which we behave as an organisation and how we expect our employees and suppliers to act.

Organisational Structure and Supply Chain

ABM Group UK is an American owned limited company, engaged in all aspects of Facilities Management and project works within the UK.

ABM Group UK uses supply chain partners for both goods and services in order to undertake maintenance and projects which are UK based. ABM Group UK and our supply chain partners may source goods and services from outside of the UK.

Our suppliers

ABM Group UK operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that the organisation has never been convicted of offences relating to modern slavery.

All suppliers are required to complete a standard Supplier Selection Questionnaire that has been introduced (which includes a section on Modern Day Slavery).

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- They pay their employees at least the national minimum wage
- For international suppliers, that they pay their employees any prevailing minimum wage applicable within their country of operations
- We may terminate their contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

Due Diligence

From the date of this statement slavery and human trafficking enquiries will be made into any new supplier engagements. This process will include, in any new contractual documentation issued by ABM Group UK, a requirement that our suppliers confirm their compliance with the Modern Slavery Act 2015.

With regards to international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes in place.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Good levels of communication and personal contact with the supply chain and their understanding of, and compliance with, our expectations (use of SafeContractor and other recognised industry bodies as appropriate).

Name: Chris Townsend

Signed:



Position: Senior HR Director UK & MENA

Date: 5th January 2021