

Anti slavery and

Human trafficking statement



ISS UK LIMITED



INTRODUCTION FROM MATTHEW BRABIN

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. ISS UK Limited and its subsidiaries (ISS) have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

From the very outset our corporate

behaviour has been guided by a set of ethical values which are now firmly embedded in our culture: entrepreneurship, quality, respect and honesty. Within the ISS global group as a whole success is measured not only in economic terms but also by the way in which we live up to our obligations towards our employees, customers, shareholders and society in general.

Our commitment was recognised in 1999 when our parent company ISS A/S accepted an invitation to join the UN Global Compact along with others of the world's leading companies to improve human rights, labour conditions and the environment. Our participation in the UN Global Compact simply sets them

in a wider context and means that we undertake to contribute actively towards the adoption of the ethical principles on which the UN Global Compact is based. Modern Slavery is also addressed by ISS A/S in its Corporate Responsibility Report showing our continued commitment as a group to modern slavery: <https://www.issworld.com/corporate-responsibility/approach-to-cr/uk-modern-slavery-act> ISS is therefore proud of the steps it has taken to date to combat slavery and human trafficking but at the same time is constantly looking for ways to improve our systems and processes.

I set out below some of the steps we have already taken:

Right to work

Illegal working often leads to exploitative behaviour and can have an adverse impact on the employment of people who are lawfully in the UK.

Our processes for ensuring employees have the right to work (RTW) have long followed the guidance contained within the Home Office Guidance for Employers on Preventing Illegal Working. Audits by the Home Office have confirmed that our systems and procedures are robust and have met all the guidelines and expectations.

However, we recognise that just following the Home Office guidance would only provide a statutory excuse and would not necessarily ensure that our entire workforce has a right to work in the UK. As a result, we have also adopted a zero tolerance policy to illegal working and introduced a number of additional measures that go beyond the requirement of legislation.

One of these measures is our RTW scanning solutions which were developed to combat the high levels of forged and counterfeit paperwork currently in circulation in the European labour market. Designed for front line management use, it allows for the effective management of both our own reputational risk, the customer's expectations of an assured workforce and the curtailment of the exploitative behaviour illegal working causes.

The scanners have proven their value, identifying paperwork that was not authentic despite appearing to be so to the naked eye. We share our knowledge and technology with customers to help further disrupt this illegal and exploitative behaviour. Further technological tools are being developed, including using facial recognition technology to stop people substituting imposters, another exploitative tactic used by those extorting the unlawful labour market.



Living, not surviving

As a responsible, ethical business, we recognise that our success depends upon on an engaged and productive workforce that is well looked after. Intrinsic to this is a fair rate of pay which is why we committed to supporting the Living Wage before it became law so that all our workers could afford a basic standard of living. It was a proactive stance that cemented our position as an ethical employer and was aligned to the approach and values of many of our key customers including KPMG, PwC and Linklaters. We formalised our support by signing up to the Living Wage Service Providers Recognition Scheme. The Living Wage Service Providers Leadership Group, which set the strategy for the scheme was chaired by our former CEO Richard Sykes until 2016 and by me until 2018, further reiterating our stance as an employer committed to paying a fair wage. We remain a member of this Leadership Group. The ISS ethical standards relating to our workforce are enshrined in our ISS Code of Conduct

Our supply chain

We recognise that the support of our suppliers is intrinsic to eliminating slavery and we have put in place a robust assessment and audit system for our supply chain. This is outlined below under the heading Our Supply Chains.

Our commitment to human rights is outlined in the Anti-Slavery and Human Trafficking Policy, the ISS Group Corporate Responsibility Policy, the ISS Global People Standards, the ISS Global Supplier Code of Conduct and through the issuing of Ethical Business questionnaires to our suppliers and sub-contractors which requires the acceptance and signature to some key questions centred on Modern Slavery, anti-bribery, collective bargaining, living wage and many other socio-economic factors which affect our suppliers workforce.

ORGANISATION'S STRUCTURE

ISS UK Limited is the UK subsidiary of a leading global provider of facility services, offering services on an international scale. It comprises ISS UK Limited and its subsidiaries and employs around 36,500 employees in the UK. Further details are available from our website: <http://www.uk.issworld.com/>

OUR BUSINESS

Our business is organised into various different companies which are set out below. Those companies which have an annual turnover of over £36M are highlighted in bold.:

OUR SUPPLY CHAINS

Our supply chains include providers of goods and sub-contracted services to enable the business to deliver single service, bundled services and total integrated facilities management to a range of public and private sector clients. These suppliers are managed internationally by ISS A/S, nationally by ISS UK Limited or locally by our client facing operational teams, using tools which reflect the professional procurement processes in use.



- ISS UK Limited which is the parent company and employs our head office staff
- **ISS Facility Services Limited which comprises our private sector business**
- **ISS Mediclean Limited which comprises our public sector business operating in the healthcare, education, local authority and defence sector**
- ISS Damage Control Limited which is our commercial disaster recovery company for England and Wales
- ISS Damage Control (Scotland) Limited which is our commercial disaster recovery company for Scotland and
- Spectrum Franchising Limited which is our disaster recovery and specialist cleaning franchise for domestic properties

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. In the UK our Anti-slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. This is underpinned by the ISS Global Policies on Corporate Responsibility and Global People Standards. We also have a suite of other HR policies and guides for our managers and supervisors across the UK business, which equip them to manage and mitigate human slavery risks. These include our: Pre-Employment Screening Policy, Recruitment Policy and Speak Up/ Whistleblowing Policy which offers a helpline service for anonymous complaints.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have carried out a risk based assessment on our supply chain to identify areas where ISS should focus efforts for carrying out further due diligence:

- All significant ISS suppliers are on boarded and assessed using a tool which includes adherence to the Modern Slavery Act 2015, ISS A/S's Supplier Code of Conduct and other social driven initiatives. Any supplier who does not respond to our satisfaction will not be permitted to become a supplier
- The standard Terms and Conditions of business for suppliers and subcontractors cover compliance with all current legislation. We have updated our standard Terms and Conditions of business to include specific reference to the Modern Slavery Act 2015 and its requirements.
- We segment the supply chain by category and review what further checks on suppliers sitting in certain high risk categories are necessary. This will depend on the likely level of risk and spend. Currently we consider our higher risk categories to include the supply of temporary labour, food and uniforms/ clothing. Further checks can include Credit Checks, online investigation, other supplier client discussions. Suppliers with spend above a certain threshold in the high risk categories are considered for further more intrusive audits and verification checks

- During our financial year for 2018 we continued to roll out a system we call ISS ProcurePASS across our supply chain in ISS UK. This is a risk assurance assessment tool supplied by Achilles which looks at such elements as Health and Safety, Ethical Business standards and a variety of other business impact areas to identify risks to us and our clients. ISS ProcurePASS has a low, medium and high process flow depending on the responses provided and will give ISS the insights to develop improvement plans where necessary or identify intolerable risks to the business, and provide an independent third party business risks audit carried out by Achilles for high risk suppliers and sub-contractors.

ISS ProcurePASS has been rolled out to nearly 50% of our supply chain and to date we have verified and qualified suppliers and subcontractors in the system representing over 60% of the ISS UK spend. The ISS ProcurePASS is now being rolled out across all ISS country operations around the globe, driven by our parent company, ISS A/S. All suppliers must confirm acceptance to the ISS Supplier Code of Conduct before they are able to complete the ProcurePASS process.

We have in place systems to:

- 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.



SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our ethical values we take steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain. Our on boarding questionnaire and ISS Group Supplier Code of Conduct set clear expectations for our suppliers which we expect our suppliers to meet. We regularly

notify our suppliers of their obligations to comply with our ISS Group Supplier Code of Conduct.

In addition our supplier terms and conditions of business contain language requiring suppliers to comply with all current legislation, including the Modern Slavery Act 2015 and our ISS Group Supplier Code of Conduct.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, ISS A/S has produced an e-learning programme on the ISS Group Code of Conduct which references modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2017.

ISS UK LIMITED

SIGNATURE



.....

DATE

31 March 2019



Anti slavery and

Human trafficking statement