

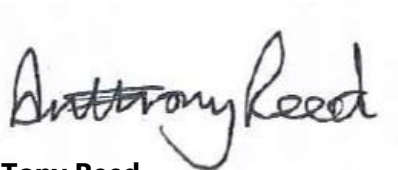
MODERN SLAVERY STATEMENT

Why is this policy important to us?

We are passionate about caring for our people and are proud to be part of the communities in which they live. Our responsibility goes far beyond that of just providing people with work and we consider it our duty to ensure all of our colleagues, their families and our partners are provided safe and welcoming environments in which they work.

At TC we understand that Modern slavery impacts 5 people in every 1,000 across the globe and are committed to play our part in tackling this very real issue. With this statistic in mind we are always mindful that this could be happening to any one of our colleagues, their families or within our supply chain and it is our responsibility to ensure we provide safe and confidential ways in which they feel they can talk to us should they need to.

The following statement sets out our commitments and approach in dealing with Modern Slavery and Human Trafficking.



Tony Reed
Chief Executive Officer



Our Business

TC Facilities Management Ltd (TCFM) operates in the Facilities Management sector, predominantly in the retail, distribution and office sector. We are a privately-owned service provider, established in 1962, based in the UK and with a primarily UK based supply chain. We employ over 4,000 colleagues in a number of locations across the UK, from a wide variety of backgrounds and nationalities.

Head Offices

in Tadworth
and Wakefield



4,000+
colleagues



1,900
sites of cleaning



34
distribution centres

Our policies to mitigate the risk of Modern Slavery

We have an Anti-Slavery Policy, which sets out our zero-tolerance stance on slavery and human trafficking, as well as providing our employees with guidance on how to identify and report slavery concerns, if necessary, using the separate Whistleblowing Policy. Our Code of Conduct sets out the labour, social and environmental standards that we expect of our suppliers and their sub-contractors, subsidiaries and own suppliers. TC and our suppliers ensure there is no slavery, forced labour or human trafficking in our business or at any stage of our supply chain and those suppliers who manufacture products should meet the provisions of the Ethical Trading Initiative (ETI) Base Code or similar standards. All new suppliers are requested to adhere to our Code of Conduct and, as set out below, we ask certain suppliers to report on this through the Code of Conduct Questionnaire, as part of our due diligence process.



How we identify and manage risks

Recruitment

Our industry leading recruitment processes ensure that not only are we and the customers we serve safe and legal; we can use the checks we do as a safeguarding process for our colleagues.

All our people undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks. We employ our people directly with checks in place to ensure that payment of salary is made directly to that person.

In addition, we carry out Right to Work checks bi-annually for all colleagues, either through our own assessment or one carried out in conjunction with our client.

Our Recruitment Procedure outlines the mandatory requirements which includes the requirement to use approved agencies in the recruitment process. Our On-Boarding Procedure seeks to ensure that third party providers can demonstrate that they comply with all legal requirements, including the requirement to comply with the Modern Slavery Act 2015.

Training

We continue to strengthen employee awareness of our stance on slavery and human trafficking. We have updated our guidance for our suppliers, adding details of plans for managing the risk within our supply chain. This complements the training created for our own people, so they understand the issues involved, become more aware of the risks, the signs to be vigilant of and how to raise awareness should they see or fear something suspicious.

We believe that improved awareness is one of our most effective methods to reduce the risk of modern slavery and with the help of both our employees and suppliers we aim to ensure that there are no opportunities to hide forced labour within our organisation or our supply chain.

We are taking a targeted approach to more detailed training on slavery and human trafficking (either by way of workshop training or an e-learning module, as appropriate). This will cover our people involved in our procurement processes and the hiring of staff, especially where this involves the promotion and monitoring of our agency workers.

We will re-train all our line managers throughout 2020 in the awareness of Modern Slavery and Human Trafficking.

Business and supply chain risk assessment and risk management

Within our Supply Chain

Our supply chain includes sub-contractors, suppliers and labour agencies. Our Supplier Code of Conduct reflects our longstanding commitment to ensuring that we act ethically and with integrity in all of our business relationships, supported by continuous development and implementation of effective systems and controls. As part of our due diligence checks when on-boarding new suppliers we require that they sign up to and adhere to the Code of Conduct including ensuring that they conduct business within all applicable laws and regulations, including the Modern Slavery Act and that they make proper provision for the health, safety and wellbeing of all employees, visitors and customers.

- **Supplier Code of Conduct** - The business is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

As part of our commitment to ensure that we do not have any slavery or forced labour in our supply chain we committed in the last financial year to review all of our processes and seek to engage with a third party who could assess the effectiveness of our policies and processes so we are continuing to deliver on the commitments made.

We are proud to report we are working in partnership with EcoVadis a leading driving force of sustainability and ethics. Throughout 2020 we will embed with their help and guidance a full programme that allows us to monitor and measure our commitments to our workforce and our suppliers.

Within our sub-contractor supply chain

Our Supply Chain also includes the use of Labour Providers. The company seeks to have minimal use throughout the business as it is recognised that this can potentially pose a risk to the business. We also recognise that we can minimise the risk to our business by directly employing staff on permanent terms and conditions. Any Agency Labour provider use must be authorised by Procurement and all relevant due diligence documents must be provided for review by the relevant teams prior to supply of labour.

Recruitment/Agency workers policy - The business uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All Agencies who supply temporary labour into our business will be audited a minimum of once a year.

Agency labour providers must be Gangmaster Licencing Authority (GLA) registered and follow the provisions of the Gangmaster Licencing Act 2004. Whilst a GLA licence is not always needed to supply staff into our sites due to the nature of the work, we recognise that the standards that the GLA enforce, are all requirements that protect workers from poor treatment and exploitation and therefore also ensures that we can mitigate the risk of modern slavery and human trafficking. The company also carries out regular yearly due diligence checks on any agency labour provider used in the business.