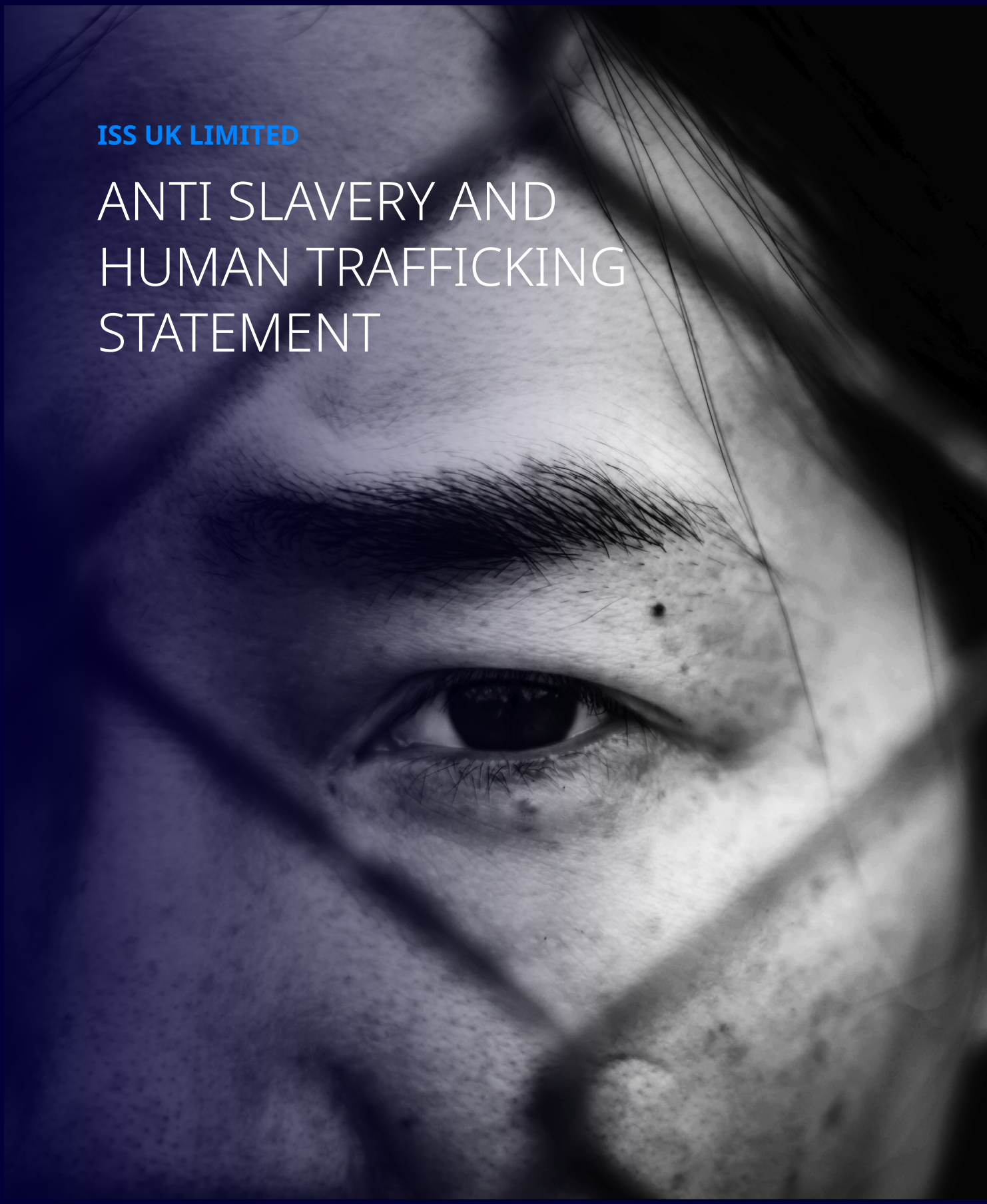


ISS UK LIMITED

# ANTI SLAVERY AND HUMAN TRAFFICKING STATEMENT

PEOPLE MAKE PLACES

# INTRODUCTION FROM LIZ BENISON

**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. This year we have added a fifth value of unity as part of the new OneISS strategy. 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 group parent company ISS A/S accepted an invitation to join the UN Global Compact along with other world leading companies to improve human rights, labour conditions and the environment. Our participation demonstrates our commitment 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 eradicating it: click here for report ISS is therefore proud of the steps it has taken to combat slavery and human trafficking to date, whilst remaining committed to continuously identify ways to improve our risk management 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 meet all the guidelines and expectations.

However, we recognise that just following the Home Office guidance alone would only provide a statutory excuse not necessarily ensure that our entire workforce has a right to work in the UK. To address this, 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 our 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, which is another exploitative tactic used by those extorting the unlawful labour market.

Home Office

## *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 ISS committed to supporting the Living Wage before it became law. We believe that all our workers should be able to 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. We formalised our support for our staff 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 CEOs (Richard Sykes until 2016 and by Matthew Brabin until 2018), further reiterating our stance as an employer committed to paying a fair wage. ISS remains a member of this Leadership Group.

The 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 the risk of slavery in our business and we are continuously improving our 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 ISS Anti-Slavery and Human Trafficking 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 ask key questions centred on Modern Slavery, anti-bribery, collective bargaining, living wage and many other socio-economic factors which affect our suppliers' workforces.



## ORGANISATION'S STRUCTURE



**ISS 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 36,000 employees in the UK.**

Further details are available from our website: click here

## 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:**

- 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; and
- ISS Damage Control (Scotland) Limited which is our commercial disaster recovery company for Scotland.

## OUR SUPPLY CHAINS

**Our supply chains include providers of goods and sub-contracted services to enable the ISS 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 the companies listed above or locally by our client facing operational teams, using tools which reflect the professional procurement processes in use.



## 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 helplines 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 new ISS suppliers are onboarded and assessed for their 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. Our standard Terms and Conditions of business include specific reference to the Modern Slavery Act 2015 and its requirements.
- We are committed to the continuous improvement of our risk assessment processes surrounding Modern Slavery and will work to enhance our visibility of potential risks in our supply chain throughout 2021. We have identified our high-risk categories (temporary labour, food and uniforms/clothing) and our Procurement and Corporate Responsibility teams will collaborate to define a revised programme of risk assessment and risk mitigation (e.g., through audit) that will meet the increasingly high standard of ethical business practice that ISS commits to.
- During our financial year for 2020 we continued to roll out a supplier accreditation scheme we call ISS ProcurePASS across our supply chain in ISS UK. This is a third-party vendor risk assurance and assessment tool, supplied by Achilles, which assesses our supplier's responses to questions on their Health and Safety procedures, Ethical Business standards and a variety of other business impact areas to identify potential risks to ISS and our clients.
- 85% of our third-party vendor spend in the UK is targeted through our Preferred Suppliers, all of whom must be accredited with ISS ProcurePASS. In 2021 we have committed to introduce enhanced controls for our non-Preferred vendor spend too, so that we can suspend engagement with non-accredited suppliers and ensure that we have assessed all of our active suppliers for Modern Slavery risk where it may apply.
- The ISS ProcurePASS accreditation scheme has also been rolled out across all ISS country operations around the globe, driven by our parent company, ISS A/S. All suppliers in each country must confirm acceptance to the ISS Supplier Code of Conduct before they are able to complete the ProcurePASS process.

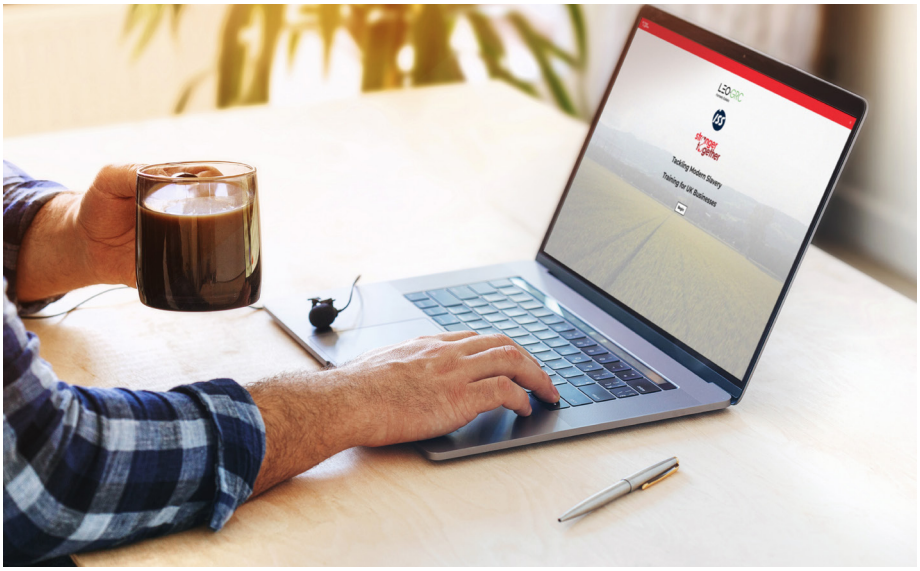
**In summary, we are continuously improving our systems to:**

- **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.**

# 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 a mandatory e-learning programme on the ISS Group Code of Conduct which references modern slavery.**

# FOCUS ON CONTINUOUS IMPROVEMENT



**We are committed to continually reviewing and improving our processes considering best industry practice. As a strategic supplier to the UK Government, we completed their Modern Slavery Assessment Tool (MSAT) early in 2020. We achieved a 'High' scoring of 74% for our approach and then implemented the following improvement actions later in the year:**

- **Modern Slavery awareness session at our annual Senior Leadership Team (SLT) meeting**, attended by our UK Executive Board and senior directors. The session was facilitated by Stronger Together (an NGO that specialises in modern slavery) and refreshed SLT understanding on what modern slavery is, and what tools/ resources are available for them to manage modern slavery risks in their business units.
- **Launch of an online Modern Slavery training module** to build understanding across the business of what Modern Slavery is, what signs of it to look out for and how best to respond to it. We partnered with Stronger Together to deliver this training and over 4,000 employees have completed it to date. ISS A/S has also produced a mandatory e-learning programme on the ISS Group Code of Conduct which references modern slavery.
- **Refreshed our Anti-Slavery and Human Trafficking policy** to include more information on what the signs of Modern Slavery are and how best to respond to it. This included enhancing our existing Speak-Up process as the tool for reporting any suspected incidents.
- **Launch of a new Modern Slavery portal on the home page our internal employee intranet**, which includes posters, toolbox talks, management guides and other resources to be used by our account teams to raise awareness on Modern Slavery with their teams at operational sites. The portal also hosts our refreshed policy and guidance on our enhanced Speak-Up process.

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 2020.

ISS UK LIMITED

SIGNATURE .....

DATE **16/09/2021**

ISS UK LIMITED

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