

Artic Building Services Ltd

Modern Slavery Act 2015: Modern Slavery and Human Trafficking Statement

Artic Building Services Ltd, are committed to continually improving our practices to ensure we always combat slavery and human trafficking in our business and supply chain. We strive to maintain high ethical principles and respect to human life. As part of our mission statement, we undertake all elements of our work safely, responsibly, and sustainably.

Organisation's structure

Artic Building Services Ltd are a provider of Hard FM Services in the Facilities Management sector. We have over 200 employees working and residing within the Central London and surrounding Home County areas. Our operations are only in England.

Our core services are delivered to our client base with our inhouse HVAC and electrical engineering team, supported by all divisions of the company including Finance, Operations, Health and Safety, HR, and Helpdesk. Where required our service provision is also complimented by our specialist Supply chain partners and suppliers.

Artic Building Services Ltd have a global annual turnover of more than £49 million.

Our business

Our business Head office is located at Dartford. We also have residential "satellite" offices within selective client buildings in London, in which we adhere to all their policies and protocols accordingly, as well as our own.

Our Dartford head office is our main hub where all our core Dept's reside, and all aspects of our service delivery take place. Our London client satellite offices are used as hubs for those who work closely with certain residential sites that have permanent teams of engineers/office members and are in situ within respective Healthcare, Education and Commercial environments.

Employees of the company, either at interview stage or as part of the induction process, will be asked to produce their passport or other photographic proof of identity, plus work permits for the UK, if relevant. This ensures that we are satisfied that the employee has the legal right to live and work in the UK. We will never demand deposits from our workers or hold on to their identity papers.

Employees are made aware of all the company's policies (including modern slavery), and we expect them to support these values, not only at work, but also in their private lives.

Our supply chains

Our supply chains include:

- Suppliers for building materials, plant parts and miscellaneous other items for project and service works
- Suppliers for materials relating to our head office and stock
- Fully vetted Subcontractors for specialist services
- Specialist Consultants for areas out of our remit, including but not limited to health and safety, HR and legal
- Furthermore, Artic Building Services will never subcontract any work that comes within the scope of the government's Construction Industry Scheme unless the subcontractor / supplier are registered with the scheme

Our policies on slavery and human trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our modern slavery statement 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. Artic Building Services Ltd also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Procurement, Evaluation and On-Boarding Supply Chain process and protocols
- Ethical Trading Policy (which includes our code of conduct)
- Illegal Workers Policy
- Modern Slavery Statement
- Recruitment Policies and Protocols
- Safeguarding policy
- Dignity and harassment policy

Please refer to our website for our Modern Slavery statement

www.articbuildingservices.com

Due diligence processes for slavery and human trafficking

We understand that the following areas give rise to the highest modern slavery risks:

- Procurement of goods

- Hiring of engineers
- Migrant workers
- Base-skilled workers (many of whom are from migrant and similar backgrounds)
- Third party labour arrangements and outsourcing labour needs
- High risk work categories

As part of our initiative to identify and mitigate risk we follow our ethical trading policy to ensure adherence

Artic Building Services Ltd also 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 and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a rigorous supply chain compliance programme. This consists of:

- an ISO accredited subcontractor evaluation form is sent to every supplier / subcontractor. Full completion is mandatory.
- Upon completion this is then vetted by our Procurement team who will carry out necessary checks to ensure all compliance documentation is sent over with the form and that their company achieves our desired minimum expectation for all Compliance, HR, Finance and Environment parameters in line also within applicable legislation.
- credit checks are completed by our finance department to mitigate any further risks.
- if all checks are completed and come back satisfactory, they will then be set up on our supplier / subcontractor list.
- this process is repeated annually for our top 50 suppliers / subcontractors. It is repeated 3 yearly for all others.
- Specific areas within our procurement vetting activities focuses on our Supply Chain awareness of Modern Slavery and mandatory feedback/documentation is required to support their commitment and awareness, to this key area of their business.

Artic Building Services Ltd have a dedicated compliance team, which consists of representatives and involvement from the following departments:

- Insurance company (only if required)
- Compliance Department (only if required for advice etc)
- Human resources (right to work checks etc)
- Procurement team
- Finance department

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business is achieved, we provide training to all our staff. This is in the form of a computer-based training module directly focusing on the Modern Slavery which coincides with other mandatory H&S training. Artic Building Services Ltd also require our business partners to provide training to their staff and suppliers and providers, and we direct them to such CBT tools to aid this. We also have in place, for relevant members of Artic, external Procurement biased Training centring on all Modern Slavery aspects and Act obligations to assist them in identifying risk and ensuring adherence is maintained across our company and supply chain.

Our effectiveness in combating slavery and human trafficking

Artic Building Services Ltd use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- We internally and via an independent party annually review our supply chain vetting process and supply chain itself
- We internally and via an independent party annually review our HR policies and Legislation protocols
- We have a legal register in place which is reviewed annually, this ensures we are adhering to the latest legislation
- HR department keep up to date legislation to ensure changes are enforced
- External evaluation of compliance audit conducted by external Health & Safety Consultants Admac Ltd
- The board have direct engagement with key persons on a quarterly basis to review all matters and activities associated to Modern Slavery
- The company has Quarterly H&S, Quality and Environmental review meetings to identify any needs/remedial actions within these areas, that is attended to by our external consultants. It does include the subject matter of Modern Slavery and Human Trafficking adherence.

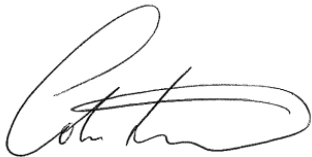
Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Further awareness to all staff with the importance of this key aspect of business
- Further education to staff to mitigate any risks of this going forward
- Continue to review suppliers and subcontractors' modern slavery policies and protocols
- Continued review of our own modern slavery and supporting policies
- Set up a reporting framework and dashboard for tier 1 suppliers for ongoing monitoring and reporting

We possess a matrix of actions and focal areas that the company is committed to enhance and developing on a yearly basis that has direct synergy to principle of the modern Slavery Act 2015, which is reviewed quarterly by the MD's and our Compliance Manager.

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 31/12/2024. It was approved by the board on 01/01/2025.



Colin Trowell

Managing Director

Artic Building Services Limited

January 2025



Paul Lucas

Managing Director