

Modern Slavery Act

Statement of Compliance 2024

Grosvenor Services is a service business, and we pride ourselves on our approach to our people, who are our most important resource.

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 as far as is reasonably practicable that modern slavery is not taking place anywhere in our business, or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we do everything reasonable possible, to ensure the same high standards from all of our contractors, suppliers, and other business partners.

The Board is fully committed to ensuring as far as is reasonably practicable, that the company and its suppliers comply with the Modern Slavery Act.

Organisational structure

Grosvenor Services is made up of several limited companies in the UK and Ireland.

These are:

- *Grosvenor Cleaning Services Unlimited (IRL)*
- *The Grosvenor Cleaning Services.*
- *Grosvenor Corporate Security Ltd*
- *Grosvenor Corporate Security (IRL)*

We are a facilities management provider in both the UK and Ireland. Our principal services are, cleaning, security services, the management of facilities including pest control, post room, reception, waste management and hard services. We have an annual turnover more than £60m, and our head office is based in Sandyford, Dublin.

We have a number of suppliers and subcontractors who deliver product and services into our client sites and or company premises.

This includes but is not exhaustive to cleaning chemicals, equipment and machinery and plant, mechanical parts for our hard services division such as air conditioning electric etc.

We subcontract services such as high-level cleaning, specialist electrical, plumbing and building maintenance.

As a business we have reviewed the areas where we believe we are at risk from human slavery. Our assessment has clearly identified that there are three main areas of risk.

- Agency workers
- Sub-contractors
- Supply chain

Agency Workers

Our policy is to directly employ staff working on our contracts. We ensure we comply with the relevant legislation relating to employment in the countries in which we operate, including any minimum wage, holiday, maternity, or other entitlements.

Where it is necessary to employ agency staff the period of employment will always be kept to a minimum.

We intend to select partners who are affiliated to the 'Association of labour providers. We will ensure that all agencies provide evidence that they comply with the Modern Slavery Act, TISC (transparency in the supply chain) and IR:35.

Sub Contractors

We review all our sub-contractors with the sole intent of ensuring that only directly employed labour work for our sub-contracting companies, and that those companies provide evidence that they comply with the Modern Slavery Act, TISC (transparency in the supply chain) and IR:35.

Supply Chain

To mitigate risk we require our suppliers, as part of our assessment process, to complete a self-assessment pre-qualification questionnaire, which includes questions targeted at slavery and human trafficking risk. The PQQ is used to determine the risk profile of suppliers for supplier sustainability issues. Suppliers completing a self-assessment questionnaire are also expected to provide evidence to support their responses to address areas such as discrimination, freedom of information, forced labour and child labour.

Our systems are designed 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.

Our Policies on Slavery and Human Trafficking

Our Procurement policy and supplier evaluation process 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 where reasonably practicable, slavery and human trafficking is not taking place anywhere in our supply chains.

Supplier Adherence to our Values and Ethics

As part of our Supplier Risk Assessment process and ongoing monitoring of our supply chain, we carry out regular reviews to ensure suppliers are assessed and the information held on our supply base is kept up to date.

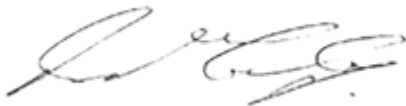
This may include supplier audits or on-site assessments dependent on the nature of the goods or services being provided and on the industry sector in which the supplier operates. The frequency of these audits or on-site assessments will be dependent on the risk profile of the contract and/or supplier. For those suppliers deemed to be high risk, a standard approach to auditing is adopted which focusses on interviewing the management and employees to identify any worker exploitation in areas such as recruitment, pay, entitlements, treatment, accommodation, and grievance mechanisms. If an audit reveals risks of modern slavery, this could result in termination of the supplier's contract

We encourage anyone, including colleagues, subcontractors, suppliers, customers, and clients to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking through our whistle-blowing policy.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adult or children.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement of compliance.

Bernard McCauley



1st January 2024

Group Managing Director

