# MODERN SLAVERY STATEMENT

# 2021

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This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by SPIE UK Limited and all its subsidiaries ("SPIE UK") during the financial year ending 31 December 2021 to prevent modern slavery and human trafficking in its business operations and supply chain.

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## Introduction

The Modern Slavery Act is intended to prevent modern slavery in organisations and their supply chains. A means to achieve this is to increase transparency by ensuring the public, consumers, employees and investors know what steps an organisation is taking to prevent modern slavery.

This is the 7th SPIE UK Modern Slavery statement, during the past year we have continued to develop our understanding of risk and we have put effective responses in place to minimise that risk.

This statement sets out SPIE UK's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking within our business and our supply chains. This statement is applicable to all of our subsidiaries.

### Our Business

SPIE UK is a subsidiary of the SPIE group, the independent European leader in multi-technical and engineering services for the built environment. It provides energy, safety and environmentally focused solutions across multi-technical and support services from initial design, through installation, testing, commissioning to long term maintenance and facilities management.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures which are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

## Supply Chain Management

SPIE UK is absolutely committed to preventing slavery and human trafficking in our corporate activities and to ensuring our supply chains are free from slavery and human trafficking.

As a company predominantly offering Engineering Services, our supply chain is characterised by skilled technical contractors and trades. We have in excess of 6,800 suppliers and subcontractors supporting our UK business predominantly (99.8%) based in the UK. Of our

direct spend in, no spend was spent with suppliers in high risk countries of origin (such countries being determined as high risk by the Global Slavery Index).

We are committed to ensuring that our suppliers and subcontractors adhere to the highest standards of ethics. As such, we ensure that our SPIE UK "*Charter for Suppliers and Subcontractors of SPIE*" applies to all of our suppliers as part of our due diligence process. The SPIE Supplier Charter states that suppliers and subcontractors must not use any kind of forced or compulsory labour as defined by Conventions C29 of 1930 and C105 of 1957 of the ILO (International Labour Organisation). Forced or compulsory labour means all work or service exacted from any person under the menace of any penalty and for which said person has not offered him/herself voluntarily (deemed to include human trafficking and modern slavery).

Within the Charter, SPIE UK also expects its suppliers and subcontractors to implement the necessary procedures to ensure that these principles are conveyed to their own suppliers and subcontractors. Any serious or deliberate failure by a supplier or subcontractor to observe the principles set out in the Charter may lead to their exclusion from our approved supplier list.

SPIE undertake CSR assessments and audits of our supply chain using the 3rd party audit body EcoVadis. EcoVadis provide scorecards which include scoring for fair Labour and Human Rights. A score of less than 30% is considered unacceptable and SPIE Procurement would work with the supplier on the areas which needed improvement. The supplier would then be re-audited by EcoVadis during the following 12 months. Failure to improve their scoring would put the supplier under consideration for removal as an approved supplier to SPIE.

It is our intention to continuously increase the number of suppliers assessed by this method in order to widen the scope of our audit programme.

**Human Resources Management**

Employee Checks - All new employees have the necessary checks carried out before they start employment which includes right to work in the UK. They will not be allowed to commence employment until after these checks have been carried out.

These checks are carried out by:

- Obtaining , checking and retaining a copy of the applicant's original documents
- Checking the applicant's right to work online if they have provided their share code and retaining a copy of the certificate
- Checking the applicant's right to work using IDVT (Identity Document Validation Technology) via the services of an IDSP (identity service provider) and retaining a copy of the certificate
- Obtaining , checking and retaining a copy of the applicant's documents via video call - This is an adjusted check due to Covid-19 extended until 30th September 2022

Until 30th June 2021 EU, EEA or Swiss citizens are able to prove their right to work in the UK by providing either their passport or National Identity Card.

After 30th June 2021, the new immigration rules for recruiting people from outside the UK will apply. From this point onwards most non-UK citizens will have to prove their right to work in the UK by providing the relevant visa. Other checks are also carried out dependant on the contract and these include DBS checks and security checks dependant on roles.

From 6 April 2022, all biometric card holders will evidence their right to work using the Home Office online service only. Physical cards will no longer be accepted for the purposes of a right to work check even if it shows a later expiry date.

Minimum Wage - SPIE UK complies with its responsibility when it comes to minimum wage and we ensure that all employees are paid this and conform to the National Living Wage rates each year.

## Ethics

In 2003, SPIE Group pledged to support the United Nations Global Compact, which asks companies to embrace, support and enact, within their sphere of influence a set of core values in the areas of human rights, labour standards, the environment and anti-corruption.

Underpinning our commitment to the prevention of unethical business conduct, SPIE UK operates an internal Ethics Committee, consisting of the Chief Executive Officer, Chief Financial Officer and Legal Director & Company Secretary. The committee would be informed in the event of any concerns of human trafficking or modern slavery risks.

SPIE UK operates the following policies that highlight our commitment to the identification and prevention of unethical activities within our organisation (including human trafficking and modern slavery):

*Whistleblowing policy* – SPIE UK encourages all its employees and other workers engaged through third party arrangements to confidentially report any concerns of unethical or illegal conduct within the organisation. This is deemed to include any circumstances that may give rise to an increased risk of human trafficking or modern slavery. There is a 24/7 confidential hotline which enables employees, contractors and suppliers to report issues relating to their working environment in a safe and secure way.

*Principles of Business Ethical Conduct* – this is a SPIE Group policy that applies across the whole of SPIE and all SPIE UK employees and workers are required to agree to comply with this code of ethical conduct on joining the organisation. This code states “SPIE complies strictly with human right laws prohibiting child labour and forced labour, any form of discrimination and the use of any illicit work” (deemed to include human trafficking and modern slavery). Any instances of non-compliance will be investigated and subject to disciplinary action where necessary.

## Training

During 2021 we have made ethics training modules available via our digital learning and development platform known as “SMILE”. These include a module specifically on Modern Slavery.

## Approval

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and constitutes SPIE UK’s slavery and human trafficking statement for the financial year 1 January

2021 to 31 December 2021. This statement was approved by the Board of Directors on 07.06.2022.



**Rob Goodhew**

**Chief Executive Officer**

**Date: 07.06.2022**