

Introduction

This statement sets out Arcus's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022

Arcus is absolutely committed to taking a robust approach in the prevention of slavery and human trafficking in its corporate activities and within its supply chain.

Organisational structure and supply chain

This statement covers the activities of Arcus Solutions (Holdings) Ltd, Arcus FM Ltd, Building Energy Management Services Ltd, Arcus Managed Services Ltd and any subsidiaries.

Our supply chain comprises of a wide range of suppliers and contractors from SME to much larger corporations across multi skill sets within the FM sector. Engaging contractor organisations to carry out works and services on our clients' sites and the sourcing of materials and manufactured products.

We fully support our corporate objectives to maintain respect for all and eradicate modern slavery and human trafficking.

After careful review of our activities, the following were identified as being at high risk of slavery or human trafficking and therefore, have relevant controls in place to mitigate risks. Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Employment:** through thorough right to work checks in accordance with Home Office guidance, we ensure that every colleague employed has the legal and ongoing right to work in the UK. New recruits are referenced checked by an independent third-party provider, Stirling, to verify their previous employment history and legal status for employment in the UK

- **Policies:** our policies are held on an internal SharePoint system and the responsibility for reviewing and updating sits with department heads. Internal audits led by our Quality Assurance team, take place regularly to ensure accuracy, relevance, and compliance.
- **Investigations/due diligence:** the company Disciplinary Policy is owned by HR and covers the process to follow for both misconduct and gross misconduct in accordance with Acas guidance. Suspected instances of slavery and/or human trafficking would be investigated in accordance with this policy by the relevant line manager in the first instance
- **Training:** training on modern slavery and human trafficking forms part of our management training programme. Our training modules have been updated and incorporated into our Mandatory Manager's training plan.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **AP003-007 Recruitment and Selection Policy** ensures all current and potential colleagues have the right to work in the UK and are thoroughly vetted and hired through a fair and consistent process. This policy states that Arcus adhere to legislation regarding employment contracts, payment of wages, health and safety, working time, holiday entitlement and rest breaks and have an obligation to pay in accordance with government national minimum wage requirements
- **AP003-021 Reporting Wrongdoing Policy** that provides a means for colleagues to report wrongdoing within the business whilst protecting whistle-blowers from victimisation.
- **AP003-034 Bullying and Harassment Policy** that sets the standards of dignity and respect expected within Arcus.
- **AP003-010 Grievance Policy** that gives colleagues a means to raise claims of poor or unfair treatment.
- **AP003-035 Anti-Bribery Policy** which ensures ethical conduct with all

suppliers and contractors.

• **AP012-001 Supply Chain Sustainable Procurement Policy** which sets our Arcus' approach to sustainable procurement and acts as guidance for procurement within Arcus.

Due diligence

Arcus ensures their suppliers of goods and services comply with the Modern Slavery Act 2015 and does not support, or deal with, suppliers or businesses that are knowingly involved with slavery, human trafficking or the exploitation of vulnerable adults or children. Arcus will not tolerate the use of deception, sexual or threatening behaviour within the organisation or its supply chain.

Arcus actively seek compliance by the management of our internal procedures where Arcus may request supplier/sub-contractors to provide as/when required, evidence that sound ethical (including, but not limited to, health, safety, welfare and environmental) standards are achieved and maintained throughout the supply chain and a high standard of corporate social responsibility.

All Arcus suppliers and subcontractors must conform to all legislative responsibilities and conform to our internal procedures and obligations set out in Arcus Terms and conditions for the Purchase of Goods and/or services particularly Clause 13 – Modern Slavery which states:

"The supplier shall:

- a) comply with all Relevant Law relating to slavery and human trafficking ("Anti-Slavery Requirements") including the Modern Slavery Act 2015.
- b) not take or knowingly permit any action to be taken that would or might cause or lead Arcus to be in violation of any Anti-Slavery Requirements; and
- c) at the request of Arcus, provide Arcus with any reasonable assistance to enable it to perform any activity required by any regulatory body for the purpose of complying with the Anti-Slavery Requirements.

The Supplier undertakes that neither it nor any other person in its supply chain will use trafficked, bonded, child or forced labor or has attempted to use trafficked, bonded, child or forced labour within its supply chain.

Arcus may immediately terminate this Contract in the event of any breach of this clause 13 by the Supplier in which case the Supplier shall not be entitled to any compensation or to any further payments or remuneration.

Arcus shall not be required to make any payment to the Supplier that might otherwise be due from Arcus in respect of this Agreement if the Supplier has breached this clause 13.

The Supplier shall indemnify Arcus from and against any and all Losses suffered or incurred by Arcus or for which Arcus may become liable arising out of or in connection with any breach of this clause 11, whether or not this Contract has expired or been terminated."

We use Alcumus Safe Contractor to support the validation of our suppliers and sub-contractors relating to accreditations and what they have in place to meet modern slavery legislation. Reviewing any policies and statements they may have including anti-bribery and corruption policy and how they ensure their supply chain complies with legislation.

Arcus have implemented the Health Safety Quality and Environment Contractor Monitoring Process with board approval to further support the management and effective control of our supply chain. This will consist of a programme of desktop and site monitoring activities against our supply chain to ensure that they are compliant with HSQE, legal and other obligations when conducting work on behalf of Arcus.