

Modern slavery statement for financial year 2022/23

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (MSA) and sets out the steps that ISS Labour Ltd (ISSL) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. ISSL has also considered the Home Office guidance including, but not limited to, Transparency in Supply Chains and guidance on the statement itself.

ISSL makes this statement as we acknowledge our global turnover is above the threshold set by the MSA and expanded upon in Home Office guidance.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ISS Labour has a zero-tolerance approach to modern slavery in any form. We are committed to acting not only ethically but with integrity and transparency in all business in which we partake and to putting systems and controls in place to effectively safeguard against any form of modern slavery taking place within our businesses and supply chain.

Our approach to Modern Slavery Act

We have risk assessed our business to identify any risks and if those risks were identified to mitigate them as well as protecting whistle-blowers and monitoring risk in our own supply chains. After the risk assessment and check on the policies and monitoring, we revisited the issue of modern slavery to consider whether our approach was effective. The risk assessment was last reviewed in January 2022.

Our high-risk areas

Labour supply is a large part of the ISSL's operations, it is understood that the sectors that could be likely to be affected by modern slavery and human trafficking are the agriculture, food processing & packaging and textiles. Whilst ISSL does very limited work in these sectors all staff will receive training to help both prevent and spot signs of modern slavery and human tracking which will apply equally across all sectors in which we operate.

Our policies

We operate a number of internal policies & procedures which help to ensure that we are conducting business in an ethical and transparent manner. These include:

- Modern slavery policy
- Whistle blowing policy, linked to an awareness of the protection of whistle-blowers
- Codes of Conduct
- Recruitment policy
- Ethical procurement policy
- Management of purchasing procedure

These policies are all linked to the way our business is operated through operational controls, workforce onboarding, labour supply and our engagement with customers and suppliers.

Our suppliers

Our supply chain consists primarily of office equipment, IT hardware, IT software, PPE, Training, Specialised Equipment for OLE services, Lithium Battery, and Lighting Equipment. We have an agreement with two intermediaries that provides us with payroll services – The Sterling Group and Crest who are not only market leaders in their field but have also been the subject of thorough due diligence by our legal team.

All candidates who are supplied via ISSL are processed appropriately under UK tax laws. We acknowledge the link that potentially exists between tax avoidance/evasion and modern slavery and human trafficking. We also have policies in place to avoid unlawful tax evasion and its facilitation.

We will not work with any supplier which conducts their operations in a manner that causes us concern. We have a team of people and external specialists who consider modern slavery from a compliance perspective and those cover the following areas: Legal, Audit and compliance, HR procurement, and sales. All temporary workers are individually interviewed prior to undertaking assignments for us and our in-depth ISO 9001:2015 approved processes are followed which are designed to comply with all relevant legislation, including the MSA.

Training

Our management teams and workforce have received training on Modern Slavery, in addition to this, all new starters receive modern slavery awareness training which includes identifying the red flags for the potential of modern slavery taking place and what to do if they have any concerns including reporting lines. At a senior director level further modern slavery training has taken place to include The Modern Slavery Act and Modern Slavery.

Other issues

The increase of homeworking in the UK raises challenges for our business. Notwithstanding these challenges, our risk assessment, monitoring and other methods have continued. We do not consider the challenges caused by increase in homeworking has impacted our ability to or effectiveness in combatting modern slavery and human trafficking.

Similarly, the changing position relating to the UK's withdrawal from the EU and the establishment of the new trading regime with the EU (together with other countries such as Turkey) has also been taken into account. We will continue to consider whether any such significant changes in the international situation change our risk assessment as we acknowledge that modern slavery and human trafficking crosses international borders.

Our performance indicators and our effectiveness in combatting slavery and human trafficking

Following our risk assessment and the review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chain, we currently consider there is no such slavery or human trafficking. We will continue in our efforts in this regard. The clearest indicator that the ISSL Group's policies are working will be no reported incidents of modern slavery or human trafficking within the group or our supply chain – be this internal reporting or through law enforcement agencies. Staff are all made aware that incidents can be reported internally to Chantelle Cowgill who is the ISSL Group contact on matters relating to Modern Slavery. Throughout FY22/23 there were no instances of modern slavery linked to the ISSL highlighted by any of the following parties:

- Stakeholders
- Employees of the business
- Temporary Workers
- Clients

Approval for this statement

This statement was approved by the ISSL Board of Directors on 30/09/2023.

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 31/03/2023.



Gary Beeston
Group Managing Director