



Slavery and Human Trafficking Statement

This statement is made on behalf of the board of TC Facilities Management (TCFM) with regards to the Modern Slavery Act 2015 which requires large companies to be transparent about their efforts to eradicate Slavery and Human Trafficking in their supply chain.

In October 2016 TCFM published its first Modern Slavery Statement to respond to the Modern Slavery Act 2015. This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and constitutes TCFM's Slavery and Human Trafficking Statement for the financial year ending 31st March 2017. The statement outlines our approach to tackling modern slavery.

Our business

TC Facilities Management Ltd (TCFM) operates in the Facilities Management sector, predominantly in the retail, distribution and office sector. We are a privately-owned service provider, established in 1962, based in the UK and with a primarily UK based supply chain. We employ over 5000 colleagues in a number of locations across the UK, from a wide variety of backgrounds and nationalities.

As part of the Facilities Management sector the business recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our corporate activities and in our supply chains.

Our policies in relation to slavery and human trafficking

TCFM complies and will continue to comply with the provisions of the Modern Slavery Act 2015. We will seek to identify, prevent and mitigate any potential human rights risks and address any shortcomings which actions within our control may have caused.

Our approach, risk assessment and due diligence can be divided into three areas

1. Within our company

In the last year we have started the journey of promoting the awareness amongst our employees of the issues of modern slavery. In this financial year we will continue to promote awareness by fully utilising our employee communication methods such as the Employee Portal, the Employee Handbook and incorporating Modern Slavery Awareness into our induction and onboarding processes.

We believe the People policies and practices we have in place currently enable us to manage the risk in an effective manner and enable us to identify any potential risk and lay out steps to take in order to prevent slavery and human trafficking in our organisation

We have the following policies in place and will ensure that they continue to be updated and reissued to the business as appropriate to reflect the serious nature of the potential issues.

- **Whistleblowing policy** - The business recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the Company's success ensured. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. This policy is



designed to provide guidance to all those who work with or within the business who may from time to time feel that they need to raise certain issues relating to the business with someone in confidence.

- **Employee code of conduct** - The Code makes clear to employees the actions and behavior expected of them when representing the business. It strives to maintain the highest standards of employee conduct and ethical behavior when operating in our business and managing its supply chain.

We also believe the following practices contributed to our due diligence in the last financial year and will continue to do so this financial year.

- All employees are on full written terms and conditions of employment.
- All employees are paid at or above the National Living Wage.
- Temporary Labour is used only on specific projects and from an agreed labour provider.
- All employees are subject to a rigorous vetting process that includes right to work, prior to employment.
- We also work closely with the Home Office to flag any potential issues that may arise.
- All employees have access to a confidential HR line where they can raise any issues around their employment.
- We are also members of SEDEX and have SMETA audits carried out on behalf of our customers.

2. Within our Supply Chain

Our supply chain include sub-contractors, suppliers and labour agencies. Our Supplier Code of Conduct reflects our longstanding commitment to ensuring that we act ethically and with integrity in all of our business relationships, supported by continuous development and implementation of effective systems and controls. As part of our due diligence checks when on-boarding new suppliers we require that they sign up to and adhere to the Code of Conduct including ensuring that they conduct business within all applicable laws and regulations, including the Modern Slavery Act and that they make proper provision for the health, safety and wellbeing of all employees, visitors and customers.

- **Supplier Code of Conduct** - The business is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

As part of our commitment to ensure that we do not have any slavery or forced labour in our supply chain we will, in the current financial year, be continuing to deliver on the commitments made below.

- Undertaking a full review of the Supplier Code of Conduct to ensure that it reflects the new legislation and appropriate controls are in place with the Supplier to mitigate any risk that may occur
- Undertaking risk assessments on our suppliers to identify those that pose the most risk to our business, focusing on suppliers we consider to be our greatest risk, including those who use agency labour, operate outside of the UK/EU or manufacture or trade in materials outside the UK/EU.
- Enhancing our supplier auditing process to incorporate an audit of compliance to the Modern Slavery Act.
- Seeking, where appropriate, copies of our suppliers Modern Slavery Act statements, which will be taken as evidence that the Supplier is starting to address this important issue.
- Training relevant commercial and procurement teams in the Modern Slavery Act, the implications for Procurement and our responsibilities within it.

3. Within our sub-contractor supply chain

Our Supply Chain also includes the use of Labour Providers. The company seeks to have minimal use throughout the business as it is recognised that this can potentially pose a risk to the business. We also recognise that we can minimise the risk to our business by directly employing staff on permanent terms and conditions. Any Agency Labour provider use must be authorised by Procurement and all relevant due diligence documents must be provided for review by the relevant teams prior to supply of labour.

- **Recruitment/Agency workers policy** - The business uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All Agencies who supply temporary labour into our business will be audited a minimum of once a year.

Agency labour providers must be Gangmaster Licencing Authority (GLA) registered and follow the provisions of the Gangmaster Licencing Act 2004. Whilst a GLA licence is not always needed to supply staff into our sites due to the nature of the work, we recognise that the standards that the GLA enforce, are all requirements that protect workers from poor treatment and exploitation and therefore also ensures that we can mitigate the risk of modern slavery and human trafficking. The company also carries out regular yearly due diligence checks on any agency labour provider used in the business.

In this financial year we will ensure that all Agency Labour Providers are audited and all due diligence checks completed.

Training available about slavery and human trafficking

In this financial year, the company will continue to develop and deliver training to relevant employees on Modern Slavery and the training will include updated information from relevant external agencies such as GLAA.

We will also in this financial year

- Aim to develop and report on key performance indicators including training and audit activities
- Extend specific Modern Slavery training to all line managers in the business and promote awareness of reporting and ways to help
- Gain knowledge and understanding of the Government approaches and other companies' approaches to support the approach TCFM take to this issue.

Board/Member approval

This statement has been approved by the organisation's board of directors who will review and update it annually.

A handwritten signature in black ink that reads 'Anthony Reed'.

Anthony Reed
Chief Executive Officer

Date: 01/11/2018