



Modern Slavery Act: Statement of Compliance 2017-2018

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 reasonable 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 a number of limited companies in the UK and Ireland.

These are:

- *Grosvenor Cleaning Services Ltd*
- *The Grosvenor Cleaning Services Ltd*
- *Grosvenor Facilities Services Ltd*
- *Grosvenor Corporate Security Ltd & subsidiaries*
- *Grosvenor Technology Services Ltd & subsidiaries*

We are a facilities management provider in both the UK and Ireland. Our principal services are, cleaning, manned guarding, security installation and testing of security equipment, the management of facilities including: pest control, post room, reception, waste management and hard services. We have an annual turnover in excess of £40m, and our head office is based in Sandyford, Dublin.

We have 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 sub contract 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.

1. Agency workers
2. Sub-contractors
3. 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.

The use of agency staff is currently under review. We intend to select partners who are affiliated to the 'Association of labour providers'.

Sub-contractors

We are currently reviewing all of 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 anti-slavery Act.

Supply chain

As part of our initiative to identify and mitigate risk we require our suppliers, as part of our tender procedures, 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.

We are committed to working over the next year to develop systems which:

- 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

On an annual basis, approved suppliers are required to upload a statement to our supplier portal to confirm their continued compliance with our Supplier Code of Conduct, including their commitment to anti-slavery and human trafficking.

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 also 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.

We will be providing training courses for our management over the next year and a poster and tool box talk will be rolled out to all staff employed by the company. We will also provide these materials to our sub-contractors

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
Group Managing Director

1st April 2017 v 3

