**Modern Slavery Statement**

**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 1st April 2018 to 31st March 2019.

As part of our supply chain, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

**Organisational structure and supply chain**

This statement covers the activities of Arcus Solutions (Holdings) Ltd, Arcus FM Ltd, Arcus Facilities Services Ltd and Arcus Managed Services Ltd.

Our supply chain comprises of the engagement of contractor organisations to carry out works and services on our clients’ sites and the sourcing of materials and manufactured products operating in the UK only.

After careful review of our activities, we identified the following activities which are considered to be at high risk of slavery or human trafficking. and therefore have relevant controls in place to mitigate the risks identified:

Responsibility for the organisation’s anti-slavery initiatives is as follows:

* **Employment:** through thorough checks in accordance with Home Office guidance, we ensure that every colleague employed has the legal right to work in the UK
* **Policies:** our policies are held on an internal Quality Management System and responsibility for reviewing and updating sits with Department Heads. Audits 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. Suspected instances of slavery and 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

**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:

* **Recruitment and Selection Policy** which ensure all current and potential colleagues have the right to work in the UK
* **Reporting Wrongdoing Policy** that provides a means for colleagues to report wrongdoing within the business whilst protecting whistleblowers from victimisation.
* **Bullying and Harassment Policy** that sets the standards of dignity and respect expected within Arcus.
* **Grievance Policy** that give colleagues a means to raise claims of poor or unfair treatment
* **Anti-Bribery Policy** which ensures ethical conduct with all suppliers and contractors

Arcus provide all managers within training on implementing the policies and support this through having a proactive HR department that provides ongoing guidance.

**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 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 Services. Such as, 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 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. Suppliers undertake that neither it nor any other person in its supply chain will use trafficked, bonded, child or forced labour or has attempted to use trafficked, bonded, child or forced labour within its supply chain. Arcus will immediately terminate contracts and/or any agreements with any supplier in the event of any breach.

**Approval**

This statement was approved on 8th April 2019 by the organisation’s Chief Executive Officer who reviews and updates annually.



Chris Green , CEO