



MODERN SLAVERY STATEMENT POLICY

Policy Reference:	AP003-020
Owner:	Human Resources
Version:	5

POLICY SUMMARY

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 2024 to 31 March 2025.

Arcus is absolutely committed to taking a robust approach to 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 and any of its subsidiaries. Our supply chain comprises a wide range of suppliers and contractors from SMEs to much larger corporations across multi-skill sets within the FM sector. We engage contractor organisations to carry out works and services on our clients' sites and for 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 a careful review of our activities, the following were identified as being at high risk of slavery or human trafficking and therefore, have the 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 may be vetted by an independent third-party provider, to verify their previous employment history and, dependent on the role they are employed to do, may undergo DBS checks. Bank accounts to which wages payments are made must be held (solely or jointly) in the name of the employee.
- **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, compliance, and fair application to all our colleagues.
- **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. In addition, the company Grievance Policy and Reporting Wrongdoing Policies are owned by HR and provide colleagues with guidance on what to do if they suspect any illegal or immoral practice and the process that will be followed to investigate this. Suspected instances of slavery and/or human trafficking would be investigated by this policy by the relevant line manager in the first instance and escalated where necessary.
- **Training:** training on modern slavery and human trafficking is included within our Equality, Diversity, and Inclusion e-learning course, which forms part of the mandatory training for all colleagues. Our colleagues are required to repeat this training every two years.

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:

- **AP003-012 Colleague and Candidate Vetting Policy:** provides information about how we undergo pre-employment and in-employment checks on candidates and colleagues to ensure we can deliver customer requirements.
-
- **AP003-007 Recruitment and Selection Policy:** ensures effective recruitment and selection practices, including considerations for hiring of temporary, agency and permanent colleagues. This policy states that Arcus adheres to consistent processes for recruitment to ensure fair and equal treatment of candidates and thorough screening and selection.
-
- **AP003-023 Reporting Wrongdoing Policy:** provides a means for colleagues to report wrongdoing within the business whilst protecting whistle-blowers from victimisation.
-
- **AP003-034 Bullying and Harassment Policy:** sets the standards of dignity and respect expected within Arcus.
-
- **AP003-010 Grievance Policy:** gives colleagues a means to raise claims of poor or unfair treatment.
-
- **AP003-035 Anti-Bribery and Corruption Policy:** ensure ethical conduct with all suppliers and contractors.
-
- **AP012-001 Supply Chain Sustainable Procurement Policy:** sets out Arcus's approach to sustainable procurement and acts as guidance for procurement within Arcus.
-
- **AP003-053 Safeguarding Policy:** provides Arcus's approach to protecting Young Workers and Vulnerable Adults against safeguarding threats, including human trafficking, and details on to approach to take where concerns are reported.

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, or sexual or threatening behaviour within the organisation or its supply chain.

Arcus actively seeks compliance from the management of our internal procedures where we request suppliers / sub-contractors to provide, evidence that sound ethical standards (including, but not limited to, health, safety, welfare, and environmental) are achieved and

maintained, and a high standard of corporate social responsibility is recognised, throughout the supply chain.

All Arcus suppliers and subcontractors must conform to all legislative responsibilities and 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 Laws 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 violate 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 labour 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 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 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 sub-contractors relating to accreditations and what they have in place to meet modern slavery legislation. We review any policies and statements they may have including anti-bribery and corruption policy and how they ensure their supply chain complies with legislation.

APPROVALS

The electronic signatures below certify that this document has been reviewed and accepted and demonstrate that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision. This document should be approved, reviewed and managed in conjunction with relevant Arcus policies/procedures/other documentation in line with the [Storage, Retention and Disposal policy](#).

Version Date:	03/09/2024		
	Name	Position	Date
Prepared By (Document Owner Departmental Representative #1)	Sharon Rob	Head of Business Partnering	03/09/2024
	Debbie Gregory	Chief People Officer	03/09/2024
Reviewed & Approved By (Affected Department Representative)	Sharon Rob	Head of Business Partnering	03/09/2024
Approved By (Department Head as the Document Owner)	Debbie Gregory	Chief People Officer	03/09/2024

COMPANY PROPRIETARY INFORMATION

This document is an uncontrolled copy of a controlled document held by the Arcus Holdings Integrated Management System when printed or distributed by any means. Prior to use, please ensure this document is the most recent revision by checking the Arcus Holdings online document library. This document is confidential and owned by Arcus Holdings, it should not be shared with any party without approval from the document owner.