



### 1. Introduction

Apleona UK Limited (Apleona) in accordance with Section 54 of the Modern Slavery Act 2015 sets out the steps Apleona is taking to ensure that there is no slavery or human trafficking in our supply chains or in any part of our business.

This statement relates to actions during the financial year 01 January 2021 to 31 December 2021.

It is a fundamental policy of Apleona to conduct its business with honesty and integrity and in accordance with the highest standards of ethics, equity and fair dealing. We know that slavery, human trafficking, servitude and forced labour (Modern Slavery and Human Trafficking) is a global and increasing challenge for governments and business.

Apleona will combat all forms of modern slavery, human trafficking and exploitation of employees throughout our operations and within our supply chain. Child labour, bonded labour and other forms of exploitation of employees cannot in any way be reconciled with our ethical values. In order to deal with this issue Apleona has developed a Modern Slavery Policy which applies to all our staff and our supply chain partners,

### 2. Organisational structure, business and supply chains

Apleona UK Limited, is a provider of integrated facilities management in the UK. As a UK based business there are 3 main regional office locations across the UK. We have a client base that extends across forty high level contracts and employ approximately 1,100 employees to deliver service solutions that work for our clients.

We provide all non-core business services through the full range of hard and soft services for private and public sectors organisations including Technical Engineering, shopping centres, pharmaceutical companies, critical environments, universities, hospitals and offices.

The organisation structure and leadership are driven by our Executive Board where processes procedures and objectives are developed and communicated to the business to be implemented and followed. Our supply chain is managed by our supply chain department and a digital solution where all our contractors, suppliers and clients are assessed before any work or payment is awarded.

Whilst we are part of a larger Group, we do not source goods or services from high risk countries where modern forms of slavery are prevalent. Our supply chain includes contractors, sub-contractors and suppliers, which are based in the UK and assessed through an electronic system with a number of checks and balances before they are allowed to work within our portfolio of contracts. The business operating model is the supply of goods and services on time at the right price and meets the relevant quality standards.

The Supply Chain Department has regular quarterly meetings with high-risk services and suppliers to ensure a consistent service provision and regular communication and engagement with the workforce.

### 3. Organisational policies

All our policies are agreed at Executive Board level and are designed to influence good behaviour and are communicated via our internal communications team. They are managed through our ISO 9001 certified management system under document control. Detailed below are some examples of our policies.

- Modern slavery and trafficking policy

- Anti-slavery and trafficking statement
- Recruitment policy
- Supplier code of conduct
- Employee code of conduct
- Whistleblowing policy
- Equality policy
- Grievance procedure

#### **4. Due diligence**

Reflecting the United Nations Guiding Principles on Business and Human Rights, our due diligence activities to combat Modern Slavery and Human Trafficking are risk based. Our supply chain has a prequalification contractor/supplier assessment scheme where our partners that supply these services and goods are formally assessed across a range of questions to ensure compliance. Additionally, they sign up to our terms and conditions which requires them to commit to our policies and confirm that they are not involved in anti-slavery and trafficking.

From a Human Resource perspective, we have robust recruitment procedures in place that ensure formal checks of personal background and documents. E.g., right to work, living wage employer

We actively seek to identify noncompliance through contract management, audit of supplier, regular meetings, reviews, and Whistleblowing. All these governance areas are encouraged by all our main stakeholders taking account of the context of the business and its operations.

#### **5. Assessing and managing risk**

Apleona has taken a risk-based approach to risk of modern slavery and identified the level of importance of the risks and issues and where appropriate putting action plans in place to managed the remedies. Our current risk assessment/Impacts identify the risk to the business to be unlikely and rare. The risk assessment and impacts will have its annual review in September 2022 unless there are significant changes identified beforehand.

#### **6. Performance indicators**

During 2020 and 2021 the following key performance indicators were performed and completed.

- Carry out awareness training in anti-slavery and trafficking to key Departments that are involved in such processes.
- Monitor any incidents of anti-slavery and trafficking

In 2022, we are committed to:

- Undertake a supply chain review and risk assessment conducted by the Procurement Department to highlight those areas within its supply chain that may be exposed to a higher degree of risk in regard to Modern Slavery and Human Trafficking.
- Carry out checks during sub-contractor business reviews to ensure continued compliance is achieved and to monitor the effectiveness of the activities put in place in order to combat Modern Slavery and Human Trafficking.
- Conduct 10 modern slavery assessment in our supply chain and
- Complete 6 on-site audits of the selected sub-contractors.
- For all directly employed employees we will continue to carry out Right to Work in the UK checks. We are Living Wage employer.

#### **7. Training**

During 2021 the following training was completed.

- Awareness training in anti-slavery and trafficking to employees at coffee morning events via Teams
- Awareness training in anti-slavery and trafficking to our Human Resources Department

- Awareness training in anti-slavery and trafficking to our Procurement Department

We will continue to target training where it will have the most effect.

We have detected no instances of modern slavery or human trafficking during the financial year 01 January 2021 to 31 December 2021.

This statement is published on our website with a link on our homepage.

As an Executive Board we approve the above statement and are satisfied that Apleona is taking appropriate steps to ensure that slavery and human trafficking is not taking place in any parts of the business or in its supply chain. We will continue to monitor the effectiveness of the steps we are taking on an ongoing basis.



Jane Podmore  
Human Resources Director Apleona, Northern  
Europe



James Thoden van Velzen  
CEO Apleona, Northern Europe