

## **Introduction**

The Modern Slavery Act 2015 places an obligation on UK businesses with a turnover of over £36 million to produce a modern slavery statement. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for this financial year.

The statement sets down our Groups commitment to preventing slavery and human trafficking in all our business activities and group companies as well as the steps we have in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Vertas Group Limited, including all companies within the Group, have examined the risk of modern slavery within its business operations and considers the risk to be low. The assessment is based upon the nature of the businesses, and that all businesses within the Group operating their services solely in the UK.

## **Organisational Structure**

Vertas Group Limited is a multi-services facilities management company operating throughout the UK. The Group consists of 10 registered companies; these are:

- ✔ Vertas Group Limited, registration 07728211
- ✔ Vertas (Ipswich) Limited, registration 10040474
- ✔ Verse Facilities Management Limited (Joint Venture)
- ✔ Vertas Environmental Limited, registration 07058155
- ✔ Churchill Catering Limited, registration 03233257
- ✔ I E M Caterquip Limited, registration 02222842
- ✔ Diamond View Cleaning Solutions Limited, registration 10599310
- ✔ Oakpark Security Systems Limited, registration 03076175
- ✔ Snackpax Distribution Limited, registration 09601986

Vertas Group Limited is a wholly owned subsidiary company of Suffolk County Council and is managed by our CEO, 2 Board of Directors, and 2 Non-Executive Directors.

We adopt a stringent procurement process which is controlled by our Head of Procurement. Suppliers to Vertas Group are reviewed and audited to ensure they have adequate policies in place to meet with the statutory requirements of the Modern Slavery Act 2015. This in turn confirms to us that the risk of slavery in our supply chain has been mitigated.

## **Our Supply Chains**

Vertas Group provides outsourced food, cleaning and support services to our clients across the UK. We only operate within the UK, however due to the wide facilities support services we offer we utilise a broad range of suppliers.

Our supply chains include but not limited to:

- Agency staff
- Cleaning Products
- Food items (fresh and sundry)

- Building and maintenance contracts
- PPE and workwear
- Specialist contractors

We remain committed to eradicating slavery and human trafficking through a combination of risk assessment, collaborative working, procurement policies, procedures, and audit activities which help us to identify, mitigate and manage the risk.

### **Supplier Due Diligence Processes for Slavery and Human Trafficking**

We recognize the importance of maintaining both visibility and transparency within our supply chain in order to continue to protect those who work within it from potential abuse and exploitation, to this end we take great care in selecting companies who supply us.

The Company undertakes due diligence when selecting new suppliers through:

- A contractor/supplier approval process
- A supplier audit programme

In the next 12 months we will continue to strengthen our approach to managing the risk of Modern Slavery within our organisation to ensure our statement is responsive with our growing business by:

- Review of Procurement Policy & Procurement Quality Management Documents
- Review Contractor and Supplier arrangements to establish risk of Contractors and Suppliers within the organisation
- Review new Supplier and Contractor authorisation process and implement across the Group
- Review new Contractor and Supplier questionnaires to meet the Modern Slavery & Human Trafficking Act and implement across the Group
- Consolidate Contractor and Supplier list held on Vertas financial system to ensure we only hold approved Contractors/Suppliers
- Develop Supplier risk matrix to evaluate the risk of each provider
- Create and introduce Supplier Code of Conduct and plan implementation process for all Contractors and Suppliers to have signed and agreed the behaviours and actions of the code
- Development of Modern Slavery & Human Trafficking awareness training through E learning
- Review Supplier audit template to include updated Modern Slavery & Human Trafficking questions and or statements.

### **Key Performance Indicators**

We will continually measure the success and performance of our organisation with the following KPI's:

- All existing suppliers to sign up to our Supplier Code of Conduct by April 2020
- All new suppliers to sign the Supplier Code of Conduct
- 85% of staff to be provided with Modern Slavery Awareness Training
- A minimum of 12 supplier audits to be completed each financial year. (12 have been completed for this financial year)

## People Policies

We are committed to ensuring that our employees are subject to fair working practices and are treated with respect. The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing policy** - the Company encourages all its colleagues, customers, and other business partners to report any concerns related to its direct activities or its supply chains.
- **Code of Conduct** - The Code of Conduct sets down the actions and behavior expected of employees when representing the Company.
- **Grievance** – employees can raise any employment concerns informally or formally via the company's grievance policy. Grievance can be raised directly with GroupHR if the employee is raising concerns about a manager.

As a service provider, Vertas Group Limited's largest resource is people and we have a robust Recruitment and New Starter procedure to allow us to perform rigorous employment checks to ensure employees have the right to work in the UK, have their own named bank account, collect at least 1 previous employment references, and where required for the role they are security vetted and/or have DBS check.

The dedicated recruitment team manage compliance with the new starter procedure and an employee is prevented from commencing employment with the company until all documentation and checks have been completed and cleared by the recruitment team.

The Group Board of Directors acknowledge that the Group is complying with the Modern Slavery Act 2015 as far as is reasonably practicable by continually developing and reviewing our policies, procedures and supply chain risk assessment and audit activity to support our business growth.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors and Group Head of HR endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement covers financial period 1<sup>st</sup> April 2018 to 31<sup>st</sup> March 2019 and has been approved and authorised by:

Name: Ian Surtees, MBA, FIoD

Position: CEO

Date: September 2019

Signature:

