

## 1. Introduction

Apleona UK Limited and its subsidiaries within the Group of companies remain fully committed to compliance with the Modern Slavery Act 2015. This statement sets out the steps we are taking to ensure that there is no modern 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 2023 to 31 December 2023.

It is a fundamental policy of Apleona to conduct its business with honesty and integrity and in accordance with the highest standards of ethics and fair dealing. We know that slavery, human trafficking, servitude and forced labour is a global and increasing challenge for governments and businesses. We will combat all forms of modern slavery, human trafficking and exploitation of employees throughout our operations and within our supply chain. We have developed a Modern Slavery and Trafficking Policy which applies to all our staff and our supply chain partners to clearly communicate our expectations on this issue.

We participate in the EcoVadis Index, a global sustainability ratings provider, to measure our performance in environmental management, labour and human rights, ethics and sustainable procurement. We achieved gold rating in 2023 and we will continue to use this benchmarking tool to drive improvements in our processes and performance year on year.

## 2. Organisational structure, business and supply chains

References to Apleona UK Limited in this statement includes Combined Technical Solutions Limited, JCW Energy Services Limited, Apleona UK PPP Limited and all other subsidiaries within the Group of companies as incorporated from time to time. Apleona UK Limited is a provider of integrated facilities management services. We provide hard and soft services and serve both the public and private sectors – from pharmaceutical, healthcare and manufacturing environments to educational establishments and corporate offices. As a UK based business there are three main regional office locations across the UK. We have a client base that extends across 40 high level contracts and employ approximately 1,500 employees to deliver service solutions that work for our clients.

The organisation structure and leadership are driven by our Senior Leadership Team where processes, procedures and objectives are developed and communicated to the business to be implemented and followed.

Our supply chain is managed by our Procurement department and involves a detailed assessment of all our contractors and suppliers before any work or payment is awarded. Whilst we are part of the global Apleona Group, we do not source goods or services from high-risk countries where modern forms of slavery are prevalent. Our supply chain includes 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 ethical and quality standards.

The Procurement department holds quarterly meetings with high-risk sub-contractors and suppliers, as identified in our Procurement Heatmap, to ensure a consistent service provision and regular communication on any specific risks identified.

### **3. Organisational policies**

All our policies are agreed at Senior Leadership Team level and are designed to influence good behaviour and are communicated via our internal communication channels. They are managed through our ISO 9001 certified management system under document control.

Examples of relevant policies are detailed below:

- > Modern Slavery Statement
- > Modern Slavery and Trafficking policy
- > 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 completes a pre-qualification contractor / supplier assessment where our supply chain partners 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 modern slavery and trafficking.

From a Human Resource perspective, we have robust recruitment procedures in place to check that candidates have the right to work in the UK before they are offered a role within Apleona. We are also a Living Wage employer and Real Living Wage is paid to all staff where Apleona directly controls the salary.

We actively seek to identify non-compliance through contract reviews, supplier audits, regular meetings and whistleblowing.

## 5. Assessing and managing risk

We maintain and regularly review our Company Risk Register, which identifies prospective and active risks within the business and we endeavour to address these in a prompt manner as and when they arise. We have appropriate controls in place to effectively manage the risks listed the Register and appropriate training is provided to colleagues throughout the year.

## 6. Performance indicators

During 2023 the following key performance indicators and targets were monitored and completed.

- > Training on modern slavery was completed by all colleagues in the HR and Procurement team;
- > An educational film on modern slavery was delivered to our key supply chain partners during our annual supplier event;
- > A new e-learning module on the topic of modern slavery was developed to roll out to in 2024;
- > The action helpline is displayed on our Intranet and was communicated through our employee magazine and monthly calendar;
- > 10 additional Modern Slavery self-assessments were conducted in our supply chain;
- > Six on-site audits were completed of selected supply chain partners, which covered modern slavery;
- > Message regarding modern slavery was included in HSEQ surgeries.

In 2024, we are committed to:

- > Roll out the new e-learning training module on modern slavery to line managers and Group-based employees in Apleona UK;
- > Include a section on modern slavery and our action helpline in all new staff inductions;
- > Ensure that all contracts, whether new in nature or those renewing existing contracts, will include a clause requiring that our suppliers, and their subcontractors, comply with the Act, and shall also include a right for Apleona to terminate the contract in the event of any breach of their Modern Slavery obligations;
- > Carry out checks during supplier / sub-contractor business reviews to monitor the effectiveness of any activities put in place in order to combat modern slavery;
- > Conduct 10 modern slavery assessment in our supply chain; and
- > Complete additional 10 on-site audits of selected sub-contractors.

## 7. Training

During 2023 the following training was completed:

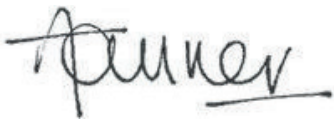
- > Awareness training on modern slavery was completed by all colleagues in the HR and Procurement team; and
- > An educational film on modern slavery was delivered to our key supply chain partners during our annual supplier event.

In 2024, we will launch our new e-learning on modern slavery to reach a wider part of Apleona UK.

We have detected no instances of modern slavery or human trafficking during the financial year 01 January 2023 to 31 December 2023.

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

As a Senior Leadership Team we approve the above statement and are satisfied that Apleona UK Limited is taking appropriate steps to ensure that modern slavery is not taking place in any parts of the business or in its supply chain. We will continue to monitor our actions on an ongoing basis.



**Adrian Connor**  
***Managing Director, UK (Interim)***