

Modern Day Slavery and Human Trafficking Policy



Introduction

Solo Service Group Limited (the Organisation) is committed to ensuring that slavery, trafficking, bonded labour, forced or servile marriage, descent-based slavery and domestic work and slavery does not take place in our business or any part of our supply chain by seeking to:

- Ensure our recruitment processes are transparent and reviewed regularly, with robust processes in place for the vetting of the appointment of our people
- Raise awareness of the issue amongst our people and our suppliers to combat the hidden nature of modern slavery
- Challenge and support our suppliers in the effort to drive out modern slavery and human trafficking

This policy sets out the steps to which Solo Service Group has taken to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

About Us

Solo Service Group was established over 30 years ago. We have grown each year to become one of the largest independent cleaning and support service providers in the UK.

We employ 3,500 staff across the country, looking after a large, diverse, blue-chip customer base, from schools, universities and Police Authorities to commercial offices and retailers. We operate in all areas of the UK and the Republic of Ireland.

Our business is dependent on our staff and our suppliers to support the delivery of our services. We ensure that they can demonstrate compliance with the Modern Slavery Act by working to our Group policies and procedures.

Our Suppliers

As a company predominately offering cleaning and support to our clients, our supply chain is characterised by skilled technical contractors and trades.

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Our approach in relation to slavery and human trafficking

We have a set of policies and procedures in place that cover human rights in general and specifically addressing relevant areas to minimise the risk of slavery or human trafficking occurring in our business or supply chains.

Our relevant policies and procedures include:

- Our Equality & Diversity Policy
- Our Recruitment Policy – supplemented by our Recruitment Procedure and our Employment Handbook
- Our Procurement Policy
- Our Whistleblowing Procedure

Code of Conduct and Ethical Behaviour

Our Code of Conduct forms the cornerstone of our wider ethical business framework. It provides our staff with the guidance and support necessary to carry out their work in the right way. Our code is designed to help our staff understand Solo's core values and the responsible behaviours which underpin them. It provides guidance and support for all Solo staff when undertaking their work and draws together all of our policies and procedures into one simple and practical guide.

We demand the highest levels of ethical and moral stewardship in Solo. We are committed to being a responsible business and to developing mutually beneficial and sustainable relationships with our stakeholders and business partners, based on trust and co-operation.

Our staff

We strive to ensure that employment is chosen freely; freedom of association is respected; working conditions are safe and hygienic; child labour is not used; wages are not lower than minimum wage; working hours are not excessive; no discrimination is practised; regular employment is provided; and no harsh or inhumane treatment is allowed.

We endeavour to carry out appropriate checks to ensure that any new applicant is suitable for the role that they have applied for. Prior to making an offer, it is our usual practice to ensure that all applicants are aware of what checks we will carry out. We make job offers subject to appropriate satisfactory vetting procedures (where required).

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All our staff undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS and Police Vetting checks. We employ most of our staff directly or on a fixed- term basis with checks in place to ensure that payment of salary is made direct to that person.

In addition to striving to ensure compliance with legislative requirements, we carry out additional background checks on a risk basis, either through our own assessment or one carried out in conjunction with our client.

Our Recruitment Procedure outlines the mandatory requirements we impose, which includes the requirement to use approved agencies in the recruitment process. Our On-Boarding Procedure seeks to ensure that third party providers can demonstrate that they comply with all legal requirements, including the requirement to comply with the Modern Slavery Act 2015.

Employee awareness and compliance

Our Employee Handbook and Code of Conduct set out our policies and key procedures. We give all our staff access to the Handbook and a summary version of our Code of Conduct when they begin working for Solo. We also provide our managers with a detailed copy of the Code of Conduct.

These core documents, together with our targeted awareness on Modern Slavery and human trafficking helps us to deliver our key messaging so that our staff can comply with our requirements.

All these documents are available internally.

Suppliers

We expect our suppliers and other business partners to have the same high standards as we impose on our own business. We actively promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain.

All suppliers complete a supplier questionnaire prior to approval to our supplier list. These questionnaires, once completed, are checked to ensure compliance to the Modern Slavery Act.

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Suppliers are required to read and acknowledge the Social Value Guidance and Modern Slavery Act. These documents set out key requirements that we expect from our suppliers including amongst other things, mitigation of risks associated with slavery and human trafficking.

Our Standard Terms and Conditions require our suppliers to comply with all legal requirements, including adherence to the Modern Slavery Act

Business and supply chain risk assessment and risk management

With the introduction of the Modern Slavery Act, we assessed our supply chain for potential areas of increased risk of non-compliance to the Act. We continue to do this and, where areas are identified, we carry out an audit, which will include a focus on compliance with employment as well as other regulatory and sustainability criteria. The defined criteria for assessing potential areas of risk within our supply chain are:

- Companies that operate using temporary low skilled labour
- Operations outside of the UK / EU regulatory frameworks
- Manufacturing or trading in raw materials produced in non-UK/EU areas
- Companies that have a strategic partnership with Solo

Our due diligence and audit processes in relation to slavery and human trafficking

We enforce our policies and procedures in an effort to ensure that slavery and human trafficking is not taking place anywhere in our business or supply chain.

Our supplier on-boarding process includes standard due diligence procedures, which help us assess the suitability of a vendor to provide goods and services to Solo against compliance to required standards. This process captures confirmation that they are committed to ensuring that slavery and human trafficking is not taking place within their own supply chain. Tender and supplier selection processes also include checks for acceptance of Solo terms and conditions and the Supplier Code of Conduct.

Our procurement team carries out desktop audits as part of our supply chain management to provide assurance that our suppliers are responsible partners in our service delivery. As in previous years, we have continued to analyse our supply chain for potential risk in the light of changes which impact our business, our suppliers and our sector. This year we have introduced changes to our supplier engagement and management process so that Modern

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Slavery is an agenda item at the review meetings held twice a year for our key suppliers (as assessed by volume of spend and risk). This enables us to identify, understand and seek to mitigate risks associated with modern slavery.

If any weaknesses in processes or governance are identified, we will seek to agree a detailed plan of action with a supplier to remedy the deficiencies.

Failure by a supplier to agree to adhere to legal requirements, to respond to any audit questionnaire or to provide assurances that it has satisfactorily assessed its own risk of modern slavery, may lead us to review our business relationship.

The effectiveness of our processes

We have introduced a number of key performance indicators (KPI's) to measure how effective we have been in communicating awareness of our core policies and procedures related to the requirements of the Modern Slavery Act, and our other actions to seek to ensure that slavery and human trafficking is not taking place in any of our businesses or supply chains. The KPI's used to measure against will be subject to ongoing review by the Directors to ensure their continued effectiveness.

Training on slavery and human trafficking

We continue to strengthen employee awareness of our stance on slavery and human trafficking. We have also updated Social Value for Suppliers Guidance which complements the training created for our own people, so they understand the issues involved, become more aware of the risks, the signs to be vigilant of and how to raise awareness should they see or fear something suspicious.

We believe that improved awareness is one of our most effective methods to reduce the risk of modern slavery and with the help of both our employees and suppliers we aim to ensure that there are no opportunities to hide forced labour within our organisation or our supply chain.

Whistleblowing

We encourage our staff, customers and suppliers to report any concerns about unlawful conduct that they suspect is taking place at work. This includes any concerns regarding the risk of slavery or human trafficking.

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Our Whistleblowing Procedure provides our people and our business partners with the ability to report suspected wrongdoing via an independent free hotline service. This service enables concerns to be reported without fear of retaliation in the knowledge that we do not tolerate harassment, victimisation or reprisals against anyone raising a concern in good faith.

In addition, employees who believe that they have come across an instance of modern slavery (or who may be a victim) and who need information and/or guidance on remedy, compensation and justice will be advised of their right to contact the Modern Slavery Helpline and/or other specialist support and assistance providers across the UK.

Our commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Solo Service Group's modern slavery and human trafficking policy for the financial year ending 31 July 2021 as approved by the Board of Directors.

Caroline Cooper
Managing Director
1st January 2025

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