



# Mill Green Facilities Limited

## Modern Slavery Policy

### Contents

1	Definition of modern slavery .....	1
2	Overview .....	2
3	Responsibilities .....	2
4	Documentation .....	2
5	Risk assessments .....	3
6	Actions we are taking .....	3
6.2	Employees .....	3
6.3	Agency workers.....	3
6.4	Suppliers of raw materials .....	4
6.5	Other suppliers .....	4
6.6	Customers.....	4
7	Due diligence, monitoring and auditing processes .....	4
8	Penalties for breach .....	5
9	Training.....	5
10	Relevant performance indicators .....	5

## 1 Definition of modern slavery

- 1.1 “Modern slavery” is a term which covers slavery (where ownership is exercised over a person); servitude (which involves the obligation to provide services imposed by coercion); forced or compulsory labour (which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily); and human trafficking (which concerns arranging or facilitating the travel of another with a view to exploiting them, even where the person consents to the travel).

## Modern Slavery Policy

---

- 1.2 We will ensure that we will comply with the Modern Slavery Act 2015 and are putting strict measures in place to ensure that modern slavery is not part of any of our business operations. This includes our supply chains, goods and services. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.
- 1.3 This statement covers our financial year ending 31<sup>st</sup> July 2022.

## 2 Overview

- 2.1 An overview of our organisational structure, key business activities and supply chains is as follows:
- The sector(s) the business operates in is the Mechanical and Electrical contracting Sectors, and Commercial Cleaning
  - Our business operating model is direct sales and indirect sales through trusted partners.
  - Charles Roc Group Limited is the immediate and ultimate parent.
  - The key value contracts are: Amsprop Group and Sports and Leisure Management. The key risk areas are the loss of contracts with our main customers.
  - The company maintains 'arms length' relationships with all its suppliers. Orders are placed on merit, taking into consideration price; delivery time; and quality of service.
- 2.2 We work closely with our main suppliers and customers; with our employees and their representatives to ensure the highest level of compliance with company policies and ethical trading initiatives.
- 2.3 We embrace socially responsible trading as part of SEDEX (The Supplier Ethical Data Exchange) and wherever possible we use Fairtrade ingredients.

## 3 Responsibilities

- The Board of Directors of Mill Green Facilities Ltd are responsible for overseeing our efforts to help to eliminate modern slavery and for monitoring progress against the KPIs contained in this document.
- The HR Manager is responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, and that any agencies used are appropriately checked and commit to ethical standards.
- Managers are responsible for upholding our "core values" and for ensuring that employees who work for them also behave in accordance with these.
- Our supply team is responsible for ensuring that appropriate checks are made prior to placing any orders with new suppliers, and that existing key suppliers are audited from time to time to ensure continued compliance.
- Our Business Development Director and QA department work with our major customers to provide them with appropriate information on our modern slavery initiatives and to gain suggestions and feedback.

## 4 Documentation

- 4.1 We have the following policies in place for employees:

## Modern Slavery Policy

---

- Business ethics policy
- Code of conduct
- Corporate social responsibility policy
- Grievance procedure
- Equal opportunity policy
- Recruitment and selection policy
- Whistleblowing policy

4.2 These are referenced in our employee handbook and copies are available on request. All policies are reviewed on an annual basis.

4.3 Employees are reminded of the policies from time and time and notified of any updates.

4.4 We issue all suppliers with our Supplier Code of Conduct and require that they sign up to this prior to any orders being placed with them.

## 5 Risk assessments

5.1 We consider that the risk of modern slavery within our business and supply chain minimal, if not non-existent.

## 6 Actions we are taking

6.1 We are constantly reviewing what steps we can take as part of our drive to eliminate modern slavery.

### 6.2 Employees

6.2.1 We have a recruitment and selection policy to assist compliance with equal opportunity.

6.2.2 All new employees are recruited directly, and we confirm to the ethical standards set out in the company's policies. Right to work checks are conducted prior to joining, and we check with all new recruits that they have not been required to pay any fees to gain work with us, and inform them of the procedures that should be followed should they wish to leave our employment. In addition, we check that their passports have not been withheld and that they have not been required to sign any agreements with any third parties in respect of our offer of employment.

### 6.3 Agency workers

6.3.1 We only use agency workers sparingly, for temporary placements and holiday/sickness cover.

6.3.2 We will ensure that any recruitment agencies we use have strict compliance to the Modern Slavery Act and require written confirmation from them that no agency worker is being exploited as part of any slavery or human trafficking. Recruitment agencies used will all be on our Preferred Supplier Listing.

## **6.4 Suppliers of raw materials**

- 6.4.1 We embrace socially responsible trading.
- 6.4.2 All suppliers are issued with our Supplier's Ethical Code of Conduct which they commit to, and which sets out key minimum standards relating to employment and workers. This will be extended to cover modern slavery. Our supplier contracts will be updated to include clear provisions that require our suppliers to commit to taking clear steps to eliminate modern slavery, both within their own business and also within their own supply chain (including with anyone with whom they sub-contract).
- 6.4.3 Suppliers are required to self-certify their compliance with the code, but contractual provisions also include that we may undertake ad hoc site visits, audits and regular monitoring etc (or to end the contract early, and without penalty to us, in the event of a breach). Contractual penalties may be awarded against any supplier for a breach of contract, or for incorrect self-auditing responses, questionnaires or the giving of incorrect information.
- 6.4.4 Major suppliers are requested to inform us of the steps that they are taking to eliminate modern slavery.

## **6.5 Other suppliers**

- 6.5.1 These include distribution / lorries / consumables / office equipment / agency workers etc.

## **6.6 Customers**

- 6.7 We also work closely with our major customers to ensure optimum environmental friendliness and to ensure that our practices and procedures are in line with national standards. This statement is brought to the attention of our customers via our website, and is also displayed in our terms and conditions.

## **7 Due diligence, monitoring and auditing processes**

- 7.1 All suppliers are issued with our Code of Conduct and are required to sign and return a commitment to ensuring that they take appropriate steps to ensure that their businesses and supply chains are free from modern slavery. prior to any orders being placed with them.
- 7.2 We audit our suppliers to ensure their production sites meet our hygiene, environmental and working standards.
- 7.3 This audit will also extend to their employment practices and procedures to check whether slavery or human trafficking exists in their business.

## 8 Penalties for breach

- 8.1 If a supplier is found to be involved in any form of modern slavery, its contract will be terminated either immediately or on its due renewal date, depending on the severity of the breach and we may also report any suspicions of criminal activity to the police.
- 8.2 If the breach is a minor one, we commit to helping that supplier by providing guidance and support for the affected workers, whether by Help against victimisation, or Legal assistance to extricate.
- 8.3 If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, he/she will be subject to our disciplinary procedure.

## 9 Training

- 9.1 We will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.
- 9.2 Employees and managers are informed of any updates to our policies via email. In addition, the following have received detailed training on our supply/tendering processes: Business Development Manager; Operations Managers and Service Manager.

## 10 Relevant performance indicators

- 10.1 The following key performance indicators will be used to assess our progress in the year to 31<sup>st</sup> July 2021 towards eliminating modern slavery:
- all staff in sales and purchasing departments to be trained by 31<sup>st</sup> March 2021
  - number of complaints raised through our grievance or whistleblowing procedures
  - number of suppliers who are terminated due to allegations of modern slavery
  - 100% of suppliers signed up to our Code of Conduct
  - number of suppliers audited during the year
  - number of suppliers passing their annual onsite audit
  - reaccreditation with relevant bodies and no remedial points to note on our annual audit

Signed: 

Date: 03/02/2022

Peter Hamilton – Director