



Modern Slavery Statement

September 2022

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by **Bidvest Noonan** for the period financial year ending July 2022 to prevent the risk of modern slavery and human trafficking in its own business operations and across the supply chain.



Modern Slavery Statement

Modern Slavery is an insidious problem across the world. The impact it has on individuals, families and communities is catastrophic. Often a hidden crime, it is unacceptable that innocent people continue to be exploited for the gain of others, whether through forced labour or domestic servitude.

At Bidvest Noonan we are committed to operating our business ethically and with integrity. We are an equal opportunities employer, committed to operating in accordance with current best practice and limiting any potential for labour rights violations within our operations. Bidvest Noonan facilitates continuous improvement within its Human Resources department.

As a provider of strategic outsourcing solutions, people are Bidvest Noonan's key asset. With many of Bidvest Noonan's colleagues operating in the cleaning and security sectors, the company acknowledges a medium-level risk to its operational staff in terms of labour and rights violations; as such, Bidvest Noonan takes necessary steps to mitigate these risks and ensure compliance with all legislative acts and guidelines.

This Statement sets out our approach as it is today. We remain committed to ensuring modern slavery becomes a thing of the past and, to this end, we will continue to work with our colleagues, customers, and stakeholders to review, evolve and improve the approach we are taking to ensure modern slavery has no place in our business or supply chain.

Bidvest Noonan uses only specified, reputable employment agencies to source labour and seeks to verify the practices of any new agency it is using prior to accepting resource from that agency.

In addition to our compliance with Human Rights regulations, Bidvest Noonan adheres to the Protection of Young Persons (Employment) Act 1996. The Act is designed to protect the health of young workers and to ensure that work during the school years does not put a young person's education at risk. The law sets minimum age limits for employment, sets rest intervals and maximum working hours, and prohibits the employment of under 18s on late night work. Bidvest Noonan has specified records for workers who are under 18.

We have had no breaches involving Modern Slavery during the reporting period.



Declan Doyle
Chief Executive Officer
Bidvest Noonan

Business and operational structure

Our Business

Bidvest Noonan is a market-leading facilities services group that operates across the UK and Ireland. The business employs over 27,000 well-trained and highly engaged people to deliver services, including cleaning, security, front of house, and many more.

Our success has been achieved by designing and delivering solutions that provide exceptional quality and value for customers whilst looking after our people and giving them the opportunities to work and progress in their careers. With a reputation for setting high standards and achieving exceptional results, we look forward to providing solutions that support our clients' needs and positively impact the communities we work in.

Bidvest Noonan develops strong partnerships with its clients, understanding their needs and strategy; this enables us to provide an individual service to meet the client's needs and expectations.

Our workforce is employed on a permanent contractual basis. All right to work, residency, and employment history verification checks are conducted in accordance with the Immigration, Asylum and Nationality Act 2006, UK industry specific standards and requirements.

We consider there are no activities that are at high risk of modern slavery or human trafficking. Through our supplier risk management policy and ethical purchasing policy the Company will ensure that all suppliers also adhere to the Modern Slavery Act 2015.

Our Commitment

We have a zero-tolerance attitude to modern slavery and are committed to ensuring our approach to tackling modern slavery in our own business and throughout our supply chains is consistent with the Modern Slavery Act 2015. We support and respect the protection of human rights, in particular the effective elimination of compulsory labour and child labour and are dedicated to ensuring processes are maintained to prevent it.

Board approval

This statement has been approved by Bidvest Noonan Board of directors, who will ensure it is reviewed and updated annually.

Key focus areas

Raising Awareness

Raising Awareness is key and reflects our continued commitment to providing training to increase awareness and enforce processes and controls to ensure slavery and trafficking are not occurring in our business and supply chains. We will continue to conduct regular training interventions for our employees who are directly involved in making purchasing decisions. Training focuses on the risks of modern slavery across our supply chains and on the core principles of our ethical business practices. On-line training modules will be developed during the course of this year and will be rolled out throughout the business, allowing us to monitor the compliance and understanding of team members regarding Modern Slavery much more easily. Additionally, we are actively seeking to be involved in a range of collaborative programmes to enhance employee awareness on this issue, such as the “ETI Buying Ethically programme and Modern Slavery in the Supply Chain programme.”

UNSEEN UK

Unseen UK has been appointed as our chosen Charity Partner for our business in Great Britain. Unseen UK is an organisation working towards a world without slavery and provides safehouses and support in the community for survivors of trafficking and modern slavery. There is a clear alignment between its vision and values and our own Environmental, Social and Governance Programme, which includes both a commitment to, and programmes to ensure, we operate in an ethical and socially responsible manner and maximise our efforts for the benefit of society.

Policies and procedures

We have existing policies and procedures which assist in combatting Modern Slavery:

- Modern Slavery Statement – This reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.
- Code of Ethical Purchasing and Supplier Risk Management Policy - issued to all suppliers and contractors, we require positive confirmation of compliance. These policies have been reviewed and updated during the course of 2022.
- Recruitment – we conducts robust checks on any new employee including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy – We have a whistleblowing policy so that all employees and stakeholders can raise concerns that they might have without fear of reprisals.
- Central Register of recruitment agents and supplier contracts.

Due Diligence

We will only work with suppliers who formally confirm full compliance with our policies and exhibit due diligence in monitoring their own supply chains. The demonstration of this compliance is of extreme importance and is verified by risk assessment through random visits to supplier premises, and regular review of suppliers, their policies and by monitoring their on-line and media reputations. Where necessary we include providing advice to suppliers and require them to implement action plans where applicable. We can invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our requirements, including the termination of the business relationship.

Legislation, Relevant Policies and Procedures

Some legislative guidelines incorporated into all aspects of Bidvest Noonan's activities are as follows:

Ireland

- The Employment Equality Acts 1998-2015 aim to: promote equality, ban discrimination across nine grounds, ban sexual and other harassment, ban victimisation, make sure suitable facilities for people with disabilities are available in relation to access to employment, advancing in employment and taking part in training, allow positive action to ensure everyone gets full equality across the nine grounds.
- Safety, Health and Welfare Law in Ireland, section 8 of the SHWW Act 2005 (Bullying in the workplace)

Northern Ireland

Bidvest Noonan operates in line with British Standard BS7858.

- The Race Relation (NI) Order 1997
- The Sex Discrimination (NI) order 1988 and the Equal Pay Northern Ireland 1970
- The Disability Discrimination (NI) Order 2006
- The Fair Employment and Treatment Order (Amendment) regulations NI 2003
- The Employment and Equality (Age) Regulations (NI) 2006
- The Employment Equality (Sexual Orientations) Regulations (NI) 2003

United Kingdom

- Equality Act 2010
- Modern Slavery Act 2015
- British Standard BS7858 (Vetting)
- Gangmaster Labour Abuse Authority Licencing

Policies and Procedure

- Our Vision and CREDO
- Code of Ethical Purchasing
- Supplier Risk Management Policy
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Recruitment Policy
- Equality Diversity and Inclusion Policy
- Corporate Social Responsibility Policy
- Grievance Policy
- Bullying and Harassment Policy
- Investigation & Disciplinary Policy



Risk Management and Due diligence

Particular risks we consider when assessing and managing risks include:

- Country risks (i.e., risks which are particularly prevalent or significant in certain countries) - this is particularly important for businesses with global supply chains which have components in countries where protection against breaches of human rights is limited. This lack of protection could, for example, relate to the rights of foreign contract workers (e.g., to retain their IDs and papers)
- Sector risks – there are different risks and levels of risk in different sectors (e.g., recruitment businesses that recruit staff in certain sectors operate in a high-risk environment, while a recruitment business that only recruits office workers and administrative staff could operate in a low-risk environment)
- Financial transaction risks – particularly for banks or financial institutions, which may be involved in facilitating financing from, or supporting cases of, modern slavery in operations, supply chains or through money laundering
- Business partnership risks – different business partnerships and supplier relationships will carry different levels of risks (e.g., existing long-term business partnerships may involve less risk than new partnerships, as our organisations may have a greater understanding of each other's operations and policies)
- Product or raw material risk - different risks and levels of risk are associated with certain products and raw materials. The processes and supply chains for certain products, for are more susceptible to slavery and human trafficking

Our approach to assessing the risk of modern slavery and human trafficking currently focuses on three areas:

- Direct material and component suppliers, with a particular focus on employment and rights of workers).
- Recruitment and labour provision agencies used to find and supply Bidvest Noonan with labour or Services; and
- Our own operations, to ensure our sites are safe and meet applicable labour standards.

We consider that our biggest potential modern slavery risk continues to be our supplier base. We prioritise and give high attention to this. This is subject to ongoing monitoring and evaluation.

Responsible recruitment

Internal training courses and employee toolbox talks have been designed in order to fully equip managers, supervisors, team leaders and HR professionals with the necessary skills to spot the signs of modern slavery.

Bidvest Noonan implements the following key processes throughout the recruitment lifecycle:

- We verify that all applicants who are interviewed have completed the associated application forms themselves.
- Applicants can only be interviewed at an approved location.
- We check and verify candidates 'Right to Work' documentations in line with the HMRC requirements.
- Supervisors and Team Leaders must bring any suspicion of illegal activity to management and subsequently the police.

Spotting the Signs of Modern Slavery during Employment

Supplier staff are also monitored on an ongoing basis after employment. Supervisors are trained to spot the signs of modern slavery, with particular attention paid to a number of factors:

- Physical appearance of their employees – in terms of potential of abuse or malnutrition
- Employees' personal effects, documentation, and freedom of movement
- Whether employees are regularly dropped off / collected by a third party
- The influence of third parties on staff.

Experience shows that the recruitment stage is often where workers are most at risk from modern slavery exploitation, especially where third party labour recruiters are involved, and especially where the workers are migrant. It is therefore essential we pay particular attention to this element during the recruitment process.

GOOD PRACTICE WE ADOPT INCLUDES:

- Only working with reputable labour and service providers who are legitimate, registered business entities
- Having clear Service Level Agreements in place with our labour providers
- Conducting checks on the labour and service providers' management systems, including agency worker documents (e.g., right to work documents, payslips, contracts, holiday, deductions)
- Having regular conversations with agency workers and service providers staff to understand if they have been treated correctly.



Training and awareness

Awareness-Raising Communications Programme

As well as training colleagues on role specific training requirements, Bidvest Noonan will raise awareness of modern slavery issues on our internal portal. The objective is to explain to colleagues:

- the basic principles of the Modern Slavery Act 2015.
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- Explain what external help is available, for example through the Modern Slavery Helpline.

All colleagues are responsible for reading, understanding, and complying with our internal policies. Bidvest Noonan managers are responsible for ensuring that colleagues who report to them, directly or indirectly, comply with our internal policies and complete any certification or training required of them.

Collaboration and partnership working

In order to deliver our customer contracts, Bidvest Noonan procures goods, services, and temporary labour from its suppliers. Bidvest Noonan takes steps to ensure that all suppliers agree to comply with its policies, which aim to eliminate modern slavery and human trafficking from the supply chain.

Bidvest Noonan is committed to ensuring there is transparency in the business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners.

Contact – GB only

ComplianceGB@Bidvestnoonan.com

URGENT concerns or suspicions of Modern Slavery you should Call the UK Modern Slavery & Exploitation Helpline on 08000 121 700 (operated 24 hours a day 365 days a year).

Future Steps

In the forthcoming year, Bidvest Noonan intends to take further additional steps including:

- Expanding due diligence on contractors, subcontractors, and suppliers
- Additional Modern Slavery training across the group through the development of additional on-line and face to face dedicated training courses
- Regular reviews to monitor the effectiveness of the compliance program
- “ETI Buying Ethically programme and Modern Slavery in the Supply Chain programme.”
- Reviewing whether suppliers should be ECO-VADIS Approved



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