

Modern Slavery Statement

Introduction

This statement sets out Ultimate's actions in relation to all potential modern slavery risks that could affect its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. Modern Slavery can take many forms including human trafficking and forced labour. We will not tolerate any form of slavery and this statement details how that is managed. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

As part of the security industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

The Company is one of London's leading security providers, with just over 2000 employees. We provide Front of House, High End Security, Reception and Mail Room services to our clients at over 200 locations. The Company currently operates predominantly in the City and West End of London, although we do have several sites just outside of London.

High-risk activities

The Recruitment and Vetting process is considered a key high risk activity. The Company recruit directly, and does not use agency staff. Our recruitment process involves various stringent checks that ensure that all of our employees have the right to work. We comply and adhere to BS 7858:2012 (British Standard for Security Screening) very closely in completing this procedure.

The following information is checked throughout this process:

- Personal Details (including SIA License)
- Education, employment, gaps in employment history
- At least one referee
- Details of any cautions or convictions
- Details of bankruptcy and/or court judgements
- Supporting photographic ID (passports, SIA License, etc) which is always authenticated

A potential employee's history is vetted for the last 3 years before being allowed to start work on any of our sites; once that has been completed a further 2 years will be vetted. This process/procedure is audited both internally and externally on at least an annual basis.

In addition to the above, we also maintain a live visa database of all employees who are required to have a visa in order to undertake employment. All expiry dates of visas are logged and the individuals responsible for both the visas and vetting are fully trained.

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** Our policies are reviewed at least once a year by either the HR or Compliance teams to ensure that they are still relevant, meaningful and accurate.

- **Risk assessments:** The HR and Compliance teams are responsible for risk analysis. We keep legislation registers so that we are aware of any changes to our sector.
- **Training:** Modern Slavery training has been developed as part of our management development programme which is cascaded through the organisation and further information can be found by contacting HR.

Relevant policies and procedures

The Company operates the following policies and procedures that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Supplier code of conduct** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their workers' working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment agencies** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Vetting** The Company is fully compliant with BS7858 in order to ensure that we know where workers have come from, we know their background and log and check all ID.
- **Visa checks** We have a designated Visa Manager who undertakes right to work checks for all new starters and during due diligence processes.

Due diligence

The Company undertakes due diligence when dealing with TUPE transfers. We do not take on any staff from any other suppliers. All standard staff processes including full document checks are adhered to when staff are transferred.

Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- requiring all managers and HR professionals to complete internal training on modern slavery
- requesting from our suppliers their modern slavery statements to ensure that we are happy that they are compliant

Training

The Company requires staff working in managerial roles to complete the relevant training module on modern slavery and cascade the message to their teams. In addition our Recruitment and Vetting team also undertake regular 'right to work' workshops and we cross-train internally to ensure compliance.

Board approval

This statement has been approved by the Company's board of directors, who will review and update it annually.

Head of HR & Support Services signature:



Compliance Director's signature:



Date: 1st October 2018