

The Company aims to ensure that there is no slavery or human trafficking within its business or its supply chain



Slavery and Human Trafficking Transparency Statement for Total Support Services Ltd and its affiliates operating in the UK (collectively "TSS") for the Financial Year End 30th June 2022.

This statement is made pursuant to section 54 (Part 6) of the Modern Slavery Act 2015 (the "Act") and sets out the steps that TSS have taken to address the risk of slavery and human trafficking within its own organisation and within its supply chain.

TSS Overview

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.

2021 was an exceptionally difficult year as the Covid-19 pandemic continued to sweep the world and bring significant uncertainty for millions of people. The early part of 2022 has seen further insecurity with the start of war in Ukraine. It is in uncertain times such as these that those who seek to exploit the vulnerabilities of others thrive.

At TSS, we are committed to operating our business ethically and with integrity. Our approach to business is informed by our Values: Open, Friendly and Approachable. These Values underpin the decisions we take, guide us to do the right thing, and they inform the approach TSS is taking to modern slavery. Our commitment is both clear and achievable – to prevent acts of modern slavery and human trafficking from occurring within both our business and our supply chain, within the UK and overseas.

TSS maintains relationships with many different organisations in its supply chain, as well as directly employing over 3500 Team members. Considering the general law on employment and human rights and more specifically, the Modern Slavery Act 2015. The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chain is free from slavery and human trafficking.

Organisation and Supply Chain

This statement covers all the activities of The Company. It governs all its business dealings and the conduct of all persons or organisations with whom they contract directly or who they appoint to act on their behalf.

- The Company expects all who have, or seek to have, a business relationship with them, to familiarise themselves with this policy and to act at all times in a way which is consistent with it
- The Company's HR department will liaise with the legal team to ensure that risk analysis and investigations/due diligence in relation to modern slavery and human trafficking is carried out as required
- The Company expects its supply chain to adhere to recruitment practices that ensure that all terms of employment are voluntary. Where necessary and if required, The Company will request demonstration of compliance with this statement
- More information about our business is available from our website: www.tss-uk.com

TSS' business is established on core values of trust and integrity and they take compliance with all laws, including the Modern Slavery Act 2015, extremely seriously and are fully committed to, and support, initiatives that promote the eradication of slavery and human trafficking throughout the world. Furthermore, TSS strives to ensure equal opportunities for all our workers as described in our comprehensive policies and procedures.

The Company has a zero tolerance attitude towards all forms of slavery and forced labour and only work with people who choose to work freely with them. Under no circumstances do they accept forced, bonded, involuntary or child labour and they do not confiscate personal documents of their employees nor require them to make any form of payment to secure their employment.

When the Act was originally introduced, TSS engaged with members of its compliance and operational teams and created a cross functional group with representatives from key teams including HR, Procurement and Ethics to assess the impact/potential impact of human slavery both within the organisation and within the broader supply chain.

Following investigation and analysis, it was determined both, at the time and during regular reassessment, that neither TSS nor organisations in their supply chain are at particular risk of, nor likely to, encounter modern slavery practices within their operations. Nonetheless, The Company has implemented a number of policies and practices within its organisation to ensure that they remain vigilant to the potential risks of modern slavery and to ensure that human rights are respected both within its own organisation but also in their wider operations and by the people that they work with.

Analysis of the Risks of Slavery and Human Trafficking within TSS' own Operations

In assessing the likelihood of slavery and human trafficking existing within TSS, they analysed a number of key factors namely:

- The nature of work performed by their personnel
- Communications with and training provide to their personnel
- The locations of their facilities and personnel
- Our recruitment and vetting processes
- The lack of any indication of the existence of slavery or human trafficking

Considering all these factors, both individually and collectively, The Company have concluded the likelihood of any risk of modern slavery to be very low with the stringent controls they have in place.

TSS Employees

The Company has a large, diverse workforce who are contracted to provide a mix of full and part time work at various locations across the UK, all of whom are paid the National Living Wage or above. The Company is also a Recognised 'Living Wage Foundation' Service Provider.

- HR will ensure that employees are given adequate and regular training on the issue of modern slavery so that everyone understands and complies with this policy
- The Company ensures that everyone working for the business, no matter what their role, is engaged under an employment contract which clearly sets out their pay, conditions and obligations and is clearly understood by all employees,
- Company employees receive paid annual leave entitlement in accordance with the Working Time Regulations, Statutory Sick Pay and have access to the NEST pension scheme
- Regular Knowledge Transfer (KT) Sessions are communicated at all sites at which Total Support Services operates providing information on TSS' commitments and policies
- All Employees receive a full TSS induction prior to their first shift and is carried out whenever possible in their native language. Employees are provided critical TSS employee information including wage rates and payment cycles

Recruitment & Vetting

TSS has robust recruitment and vetting procedures in place which ensures they are preventing illegal workers from entering the workforce. This is the most effective measure which prevents modern slavery from being introduced into our business.

The Company ensures that they use multiple recruitment channels including Gov.UK/Jobsearch, Indeed, social media and local advertising. Where they exist, they also try to engage with local community groups to assist the neighbourhoods in which they work, offering opportunities to the residents.

It is essential that all potential employees produce verification documentation as follows:

1. Passport or other photographic proof of identity accepted by the Home Office
2. Proof of legal residency and ability to work by way of a Visa or other acceptable form of documentation recognised by the Home Office
3. Proof of address, not older than three months, validated by a utility bill or similar.
4. Proof of a current, UK bank account.

The Company also participates in the HMRC's Real Time Information System (RTI) system, which is able to check if the potential employee's NI number is assigned to them. No Documents are confiscate or held by any TSS Management or operatives, No Fees are charged to employees as part of the recruitment and onboarding process.

Additionally, other members of the TSS group of companies utilise comparable pre-employment screening checks and when they work with these affiliated organisations, they are confident that their personnel have all undergone comparable checks into their background and willingness to work for The Company and that these are sufficient to minimise the risk of slavery and human trafficking.

TSS do not utilise agency workers, all employees are contracted TSS operatives.

Slavery and Human Trafficking within TSS' Supply Chain

TSS supply chain is relatively small when compared with other organisations. The Company's main supply chain is UK based, as such, they are able to develop close and effective relationships with their suppliers and are not exposed to the risks of modern slavery that exist in other industries, e.g. manufacturing which, by their nature, have larger supply chains.

As TSS have done within their own organisation, they assess their supply chain (and revisit these assessments periodically) to determine whether there are any risks of modern slavery or human trafficking existing within it. The Company's determination is that the risk of any abuses is for the most part extremely low however, there are a few areas which may be more susceptible to the risks of modern slavery and/or human trafficking; namely in the manufacturing of our uniforms. TSS are a Sedex registered supplier and utilise the Sedex supply chain assessments for all its overseas supply partners.

Steps taken by TSS to eradicate the Existence of Modern Slavery and Human Trafficking

TSS will evolve their Buyer and Supplier Commitments across all its clients and supply chain following supply chain principles adopted from the conventions of the UN Guiding Principles on Business & Human Rights adopting the Dhaka Principles, the Company's supply chain will commit to:

- a) Not contain child labour, or labour which is forced
- b) Providing safe working conditions for all workers employed
- c) Ensures working environments are free from physical abuse (actual or threatened), verbal abuse, all forms of harassment including bullying and any other form of intimidation
- d) Seeks to eliminate all forms of discrimination in access to employment, training and working conditions
- e) Acknowledges workers have the right to form and join organisations of their own choosing
- f) Operates without excessive hours, complies with relevant national laws and ensures overtime is only voluntary
- g) Ensures pay and benefits meet at least all national standards
- h) Provides written contracts to workers, detailing the terms and conditions of their employment in an understandable way

The Company's Compliance Team is also charged with continuing to assess risk within its supply chain, and with developing or adopting analytical tools to continue to support The Company's policies and approval process. Supply chain partners will be removed from its approved supplier list if any reports of Modern Slavery are linked to an approved supplier.

TSS is guided by their values and commitment to operate ethically across the business. In order to meet the standards that The Company sets.

TSS operate under A Supplier and Buyers commitment based on the Ethical Trading Initiative, these commitments ensure the success of The Company is based on doing business in the right way.

TSS' commitments combine their many policies and guide them on how it goes about its business day-to-day. It provides the guidelines for our ethical conduct and sets out acceptable standards of behaviour. All colleagues within TSS are provided with training about The Company's commitments and are required to follow it.

TSS Buyers and Suppliers Commitments incorporates established policies, including:

- Anti-Bribery and Corruption Policy
- Equal Opportunities
- Ethical Trading
- Recruitment and Vetting
- Eligibility to Work
- Whistleblowing
- Fraud Policy
- Sustainable Procurement Policy

TSS requires its suppliers not to use any form of forced, bonded or involuntary labour and to ensure that workers are not treated in a harsh or inhumane way – this is critical in ensuring The Company meets its commitments to reduce the risks and harms of modern slavery

Contractual Requirements: TSS have incorporated express obligations for its suppliers to comply with the requirements of the Modern Slavery Act 2015, and to flow these down to their own suppliers within The Company's standard terms and conditions. TSS also retain the right to audit its suppliers against their compliance with the Act and include questions about the Act in their standard supplier assessment questionnaire.

Supplier Commitment: TSS' supplier code of conduct, which has been in place for a number of years and against which suppliers can be audited, requires all of The Company's suppliers to act in both an ethically and legally compliant manner including with respect to their employees and staff. This code is periodically reviewed to ensure that suppliers are required to act in accordance with best practice and both the letter and spirit of all legislation.

Supplier Selection: In selecting suppliers, TSS focuses on their overall ability to work with The Company (including their commitment to The Company's Buyers and Suppliers Commitment) and not just on price alone. In doing so, The Company do not always choose to work with the cheapest suppliers who arguably may be more likely to use forced labour or behave contrary to the Act. In addition, TSS request information from potential suppliers on their approach to the Act and any areas of specific risk.

Relationships with Suppliers: TSS actively manages relationships with its key suppliers who, through either contractual requirements or dealings with TSS, should be aware of The Company's expectations regarding compliance with the Act. Should we believe a supplier to be responsible for a breach of the Act, susceptible to breaching the Act, or not acting in accordance with its principles. TSS would look to work with them to rectify the situation whilst reserving The Company's right to take more formal action, including terminating the relationship and removal from its approved supplier list, if necessary.

Confidential Helpline: TSS runs a confidential helpline that enables employees (and suppliers) to whistleblow on illegal practices without the risk of reprisal thereby creating an environment in which any non-compliant practices may be brought to the attention of TSS.

The Company's Policy on Whistleblowing encourages all its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Employees who have concerns can refer to the Company's Whistleblowing Policy which is available in all Site Packs and on the employee portal, with employee handouts provided at Induction with confidential helpline number included.

Awareness & Performance Indicators

As well as training employees, The Company will raise awareness of modern slavery issues by circulating The Company's Modern Slavery Policy to all employees via Knowledge Transfer Sessions as well as it being made available on The Company's employee portal. The Company expects employees to refer to this policy and understand what is required of them in relation to modern slavery.

The Company's policy on modern slavery will be communicated to all suppliers, contractors and business partners as part of the supplier questionnaire.

TSS are committed to a process of continuous improvement across its business and this includes their approach to modern slavery.

TSS intend to further refine their approach over the next 12 months. The Company will continue to train, educate and communicate broadly across its business with regard to modern slavery. TSS' ambition to eradicate modern slavery in all territories in which they operate is an objective to which their leadership team is deeply committed.

The Company regularly monitor Home Office Guidance to understand developments in best practice. As legislation similar to the Act is being introduced across the globe, TSS are looking to identify additional measures that they could take, or best practices that they could adopt.

TSS is conscious that the above does not provide The Company with absolute certainty that modern slavery and human trafficking has been eradicated from its organisation and supply chain. Consequently, whilst The Company considers themselves low risk, they will continue to review their processes and practices on a regular basis, to ensure that The Company continues to identify and manage risks in order to establish its ongoing compliance with the Act and its Buyers and Supplier commitments



Danny Gostt
Director
Total Support Services Ltd