

# Modern Slavery and Human Trafficking Policy

**MPD FM Ltd** is committed to driving out acts of modern-day slavery and human trafficking within its business and from within its supply chains, including sub-contractors, and partners.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to MPD FM Ltd.

As part of the company's due diligence processes to ensure slavery and human trafficking are not tolerated in any part of the supply chain and we will ensure robust controls are in place and followed by suppliers. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. The company will not support or deal with any business knowingly involved in slavery or human trafficking. The company Directors and management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request.

This policy statement will be reviewed annually and published on the MPD FM Ltd website.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2008, ISO 14001:2004 and OHSAS 18001:2007. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

## Introduction

This statement sets out the actions MPD FM Ltd take 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.

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

## Organisation

MPD FM Ltd was founded in January 2003 and specialises in providing high quality professional, reliable and cost-effective security guarding services to retail, corporate and healthcare clients as well as to the public sector and industrial organisations across the UK. MPD FM Ltd is a Security Industry Authority (SIA) Approved Contractor.

## High-risk activities

The Recruitment and Vetting process is considered a key high-risk activity. MPD FM Ltd 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 in the UK. We comply and adhere to BS 7858:2018 (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 5 years before being allowed to start work on any of our sites.

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This process/procedure is audited both internally and externally on at least an annual basis.

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 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 awareness training will be incorporated into our Induction Training.

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**

MPD FM Ltd encourages all its staff, customers and other business partners to report any concerns related to the direct activities, or its supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.

- **Employee code of conduct**

MPD FM Ltd code makes it clear to employees the actions and behaviour expected of them when representing the organisation. We strive 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.

- **Vetting**

MPD FM Ltd 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**

MPD FM Ltd has designated the HR Manager as the person responsible for undertaking the appropriate check to ensure the correct right to work checks for all new starters and during due diligence processes.

- **Due diligence**

MPD FM Ltd undertakes due diligence when dealing with TUPE transfers. All standard staff processes including full document checks are adhered to when staff are transferred.

- **Site Supervision**

MPD FM Ltd employs Contract Managers to ensure compliance on site, this includes undertaking regular scheduled and ad hoc site inspections.

## 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, MPD FM Ltd:

- All managers and HR professionals are internally trained on modern slavery awareness.
- Statements from our suppliers and sub-contractors

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## BACKGROUND

### What is modern slavery?

Slavery is a violation of a person's human rights. It can take the form of human trafficking, forced labour, bonded labour, forced or servile marriage, descent-based slavery and domestic slavery. A person is considered to be in modern slavery if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an "employer", usually through mental or physical abuse
- Dehumanised, treated as a commodity or sold or bought as "property"
- Physically constrained or has restrictions placed on their freedom of movement

The use of slavery in the production of goods and services

Typically, the products bought nowadays have passed through a long chain of producers, manufacturers, distributors and retailers who have all participated in its production, delivery and sale. It can therefore be very difficult to certify that a product has or has not been produced using slavery. However, the way in which companies operate and manage their supply chain can affect the likelihood of slavery being a part of the final product. The Modern Slavery Act, 2015 gives responsibility to companies for ensuring that no slavery has occurred, and this applies not only to the products they sell or the services they provide themselves but also to their suppliers, and the suppliers of their suppliers, all the way down the supply chain.

The Modern Slavery Act 2015- what companies are required to do

Under the Act, any company with a turnover of more than £36m must produce a statement for each financial year listing the steps it is taking to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business. This statement must be published on company websites and visible to staff, suppliers, customers and investors.

The Chartered Institute of Purchasing and Supply (CIPS) has released some guidance to help small businesses comply voluntarily with the Act; however, they suggest that ALL companies:

- Ensure all UK workers receive minimum wage and robust immigration checks
- Map supply chains to identify where there is highest risk and exposure to modern slavery
- Undertake site inspections
- Provide training to employees and local suppliers on modern slavery risks and compliance
- Review supplier contracts to include obligations to comply with the Modern Slavery Act 2015
- Publish a statement outlining the steps you are taking to tackle modern slavery

### Further information

We have provided below a list of useful links to resources, guides and information that MPD FM Ltd strongly encourages all of its suppliers to refer to in order to ensure they are fully informed about the Modern Slavery Act 2015.

### UK Government

<https://www.gov.uk/government/publications/stopping-modern-slavery-in-business-video>

<https://www.gov.uk/government/publications/modern-slavery-industry-factsheets>

<https://www.gov.uk/government/publications/support-for-victims-of-human-trafficking>

<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

Chartered Institute of Purchasing and Supply (CIPS)

<http://www.cips.org/en/Supply-Management/Analysis/2016/February/Think-your-supply-chain-is-free-of-slavery-Think-again/>

<http://www.cips.org/en-GB/Supply-Management/News/2015/October/Guide-to-compliance-with-Modern-Slavery-Act-published-by-UK-government/>

<http://www.cips.org/Documents/Knowledge/Procurement-Topics-and-Skills/4-Sustainability-CSR-Ethics/Sustainable-and-Ethical-Procurement/Modern-Day-Slavery.pdf>

**Other organisations**

<https://modernslavery.co.uk/>

[http://www.antislavery.org/english/slavery\\_today/default.aspx](http://www.antislavery.org/english/slavery_today/default.aspx)

<http://www.unseenuk.org/>

**Signed on behalf of MPD FM Ltd:**

Sharjeel Bhatti

CEO

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