

Modern Slavery and Human Trafficking Statement of Personnel Hygiene Services Limited (“PHS”)

Introduction

As a large employer in the service industry, we take responsibility for ensuring that no slavery or human trafficking takes place within PHS or its supply chain. We know that our customers and our employees share this wish and this statement sets out the actions we have taken to enable us to understand all potential modern slavery and human trafficking risks related to our business and to put in place effective steps to prevent them. This statement relates to actions and activities undertaken during the financial year 1 April 2016 to 31 March 2017.

Organisational structure and supply chains

PHS is registered in England & Wales, with its head office in South Wales and operating sites throughout the UK. Although our business is predominantly based in the UK we also have operations in the Republic of Ireland and Spain.

Our business is divided into two core areas. Our Hygiene division provides services such as washroom hygiene and matting, while our Specialist division provides office plants, crate rental, provision of waste balers/compactors and other business to business products and services.

We employ many service personnel to carry out this work. All employees are paid via payroll which is administered in accordance with HRMC regulations in the UK and the equivalent authorities in the Republic of Ireland and Spain.

Responsibility

Everyone within PHS has a responsibility to be alert to the risks, however small, of slavery and human trafficking within our business or in the wider supply chain. Employees are expected to report any concerns that they may have and we are committed to act upon any issues brought to our attention.

All new starters have to produce evidence of their right to work in the UK before they are offered positions within the business. All UK-based employees are paid at least the National Living Wage and this is monitored to ensure compliance. We do not employ casual labour and we do not pay any employee in cash.

Before being accepted as approved suppliers, all potential suppliers must complete a detailed pre-qualification process to ensure that they are legally compliant and aware of PHS values, policies and processes. PHS will never knowingly use suppliers whose values do not reflect our own.

Relevant policies and procedures

The following policies explain how we identify any modern slavery risks and how we aim to prevent slavery and human trafficking in our operations:

Whistleblowing policy: we encourage all our employees, customers and other business partners to report any concerns related to our direct activities, or those of our supply chain. 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 our employees to make disclosures, without fear of retaliation.

Anti bribery and corruption policy: we are clear that bribery and corruption will not be tolerated within PHS and we encourage employees to report any concerns that they may have so that we can investigate them.

Employee Handbook: Our handbook sets out the code of conduct expected of our employees and we set high standards for the actions and behaviour we expected of them. We trust our employees who are managing our supply chain to maintain the highest standards of employee conduct and ethical behaviour, and ensure that they have the knowledge required to do this effectively.

Supplier/Procurement code of conduct: we are committed to ensuring that our suppliers meet our high ethical standards. We ask all our suppliers to demonstrate that they provide safe working conditions, treat their employees with dignity and respect, and act ethically and within the law in their use of labour. We work with our suppliers to ensure that they meet the standards of our code however any serious violation of the PHS supplier code of conduct will lead to the termination of the business relationship with that supplier.

Recruitment and employment of Agency employees: In 2017 we completed a review of all the agencies that we work with to ensure that we only source labour from reputable employment agencies. Only agencies that have been approved by our Procurement Department are used and any new agencies will go through the verification process before we accept any employees from them.

Corporate social responsibility policy: Our policy defines our approach to Corporate Responsibility and it recognises the balance that we need to achieve between our business objectives and our corporate responsibilities and commitments. It outlines our standards for managing the risks and opportunities within our Corporate Responsibility which includes equality of opportunities for all of our employees and ethical standards of behaviour.

Due diligence

We undertake due diligence when considering new suppliers, and we regularly review our existing suppliers. Our due diligence and reviews include:

- conducting supplier audits and/or assessments;
- regularly review all suppliers in our supply chain, to identify any supplier that due to the product, industry or geography potentially have an increased risk of modern slavery;
- take steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- impose sanctions against suppliers that seriously violate our supplier code of conduct or fail to improve their performance in line with an action plan, including the termination of the business relationship.

Performance indicators

We have a robust system for supply chain verification and in light of the introduction of the Modern Slavery Act 2015 and we regularly review our performance against our own KPI's and also any best practice.

Training

We require all employees working with suppliers and procuring from the supply chain to complete training on preventing modern slavery.

Our modern slavery prevention training covers our purchasing practices, which influence supply chain conditions and which should therefore prevent purchases at unrealistically low prices; the use of labour at unrealistically low wages or wages below a country's national minimum wage; and the provision of products by an unrealistic deadline.

Our training also explains the new modern slavery legislation and gives guidance on how to escalate potential slavery or human trafficking issues within our organisation;

This statement has been approved by the PHS Executive Directors, who will review and update it annually.

PHS CEO:



Date:

17th August 2017