

## **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 have a zero tolerance to slavery and human trafficking and respect the rights of all our employees and those within our supply chain. We know that our customers and our employees share this objective 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 22 June 2020 to 27 June 2021.

### **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 subsidiary companies operating in Ireland and Spain.

Our business is divided into two core areas. Our Hygiene divisions provide services such as washroom hygiene, healthcare waste disposal, matting and hygiene consumables, while our Specialist businesses provide office plants, crate rental, balers/compactors, laundered workwear and electrical testing and equipment calibration.

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

We occasionally use temporary labour in certain areas of our business and use screened approved suppliers who are expected to meet our supplier code of conduct.

### **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 must 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 employ a minimal number of individuals on “zero hours” contracts (where the individual can choose to take or decline work offered) 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. In addition, our Procurement team have piloted an annual Audit for high-risk suppliers and as part of the audit a review of their Code of Conduct and HR policies are included. 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 business:

**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 retribution.

**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 so that we can investigate them.

**Employee Handbook:** Our handbook sets out the code of conduct and the core values/behaviours expected of our employees. We require those employees who are managing our supply chain to maintain the highest standards of employee conduct and ethical behaviour, and we 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 require all our suppliers to provide written confirmation 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 through employment agencies:** Our in-house Resourcing team sources the majority of our employees directly, however if we need to engage with a recruitment agency, we have checks in place to ensure that we work only with reputable agencies who adhere to our code of conduct. Only companies that have been approved by our Procurement Department are engaged and any new agencies must complete a verification process before we accept any employees from them.

**Employment of agency workers through employment agencies:** In 2019-20 we completed a review of the agencies we use for temporary labour and have appointed a neutral vendor provider to manage all our temporary labour requirements. The neutral vendor and all agencies are regularly audited to ensure compliance not only with all current legislation but with the phs code of conduct.

**Corporate social responsibility policy:** Our Corporate Responsibility (CR) Report is published annually and highlights our progress against the challenging targets we have set ourselves. The report outlines our performance in key non-financial metrics, including carbon footprint, health and safety, community engagement, employee development and supply chain ethics. The report is available online at <https://www.phs.co.uk/corporate-governance/corporate-responsibility-cr-report/>

## Training

We require all Procurement employees working with suppliers and purchasing 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 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 review and update it annually.

A handwritten signature in black ink, appearing to read 'Matthew Brabin', with a horizontal line underneath.

**Matthew Brabin**

Chief Executive Officer

Date: 11 July 2022