

Cordant Group plc Modern Slavery Statement 2019

This statement refers to the financial year ending 31st December 2018 (updated May 2019) and details the steps taken by the Cordant Group to prevent modern slavery and human trafficking in our business and supply chains.

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Introduction

This statement covers the activities of Cordant Group plc and the trading subsidiary companies listed below:

- Cordant Cleaning Limited
- Cordant People Limited
- Cordant Security Limited
- Cordant Technical Limited
- Core Staff Services Limited
- Eurostaff Group Limited
- PMP Recruitment Limited
- Premiere Employment Group Limited
- Sugarman Group Limited
- Sugarman Health & Wellbeing Limited

It has been published in accordance with the Modern Slavery Act 2015 and details the action taken by us to prevent and combat modern slavery and human trafficking within our business and supply chain. This is our third annual statement.

Modern slavery is a crime and a violation of fundamental human rights which is estimated to affect c.21 million victims worldwide. It takes various forms; slavery, servitude, forced and bonded labour; and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

With 6,993 potential victims submitted to the National Crime Agency's Referral Mechanism in 2018, a 36% increase on 2017¹, the Cordant Group recognises the need to raise awareness and to be proactive in working to prevent all aspects of modern slavery. We have a zero-tolerance approach to modern slavery and expect all who have, or seek to have, a business relationship with Cordant, to familiarise themselves with our anti-slavery and human trafficking policy and to act at all times in a way which is consistent with this policy.

We are committed to acting transparently, ethically and with integrity in all our business transactions and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in our supply chains.

We believe in a society united by shared opportunities. Where everyone can maximise their own potential, find fulfilment and live meaningful lives.

¹ <https://www.unseenuk.org/modern-slavery/facts-and-figures>

Our Business

Cordant Group plc (Cordant) provides integrated services including recruitment, security, cleaning and technical FM services. We blend our experience with industry knowledge and digital capabilities to create seamless processes which boost performance and profitability. Founded in 1957, Cordant remains a leader in recruitment and integrated facility services. In September 2017 we became the largest social enterprise in the UK.

As a social business, our success lies in positive impact and as we are in the business of working with people across the country, we are in an excellent position to make a true difference.

Our Supply Chains

Our supply chains are limited to those individuals and organisations who provide Cordant with the goods and services needed to operate its business, such as the sourcing of labour, materials, stationery, workwear, PPE, cleaning material telecoms and IT equipment; and other materials principally related to the provision of our services, construction, integrated services and installation and maintenance.

Our Policies in relation to Modern Slavery

Our commitment to improve society person by person is supported by a number of policies and processes including the following:

- Anti-Slavery & Human Trafficking Policy
- Whistleblowing Policy
- Eligibility to Work Standard Operating Procedure
- Payroll Standard Operating Procedures

Our business model and policies go hand in hand with our drive to improve society, and we have developed our Survive, Thrive and Revive Strategy in alignment with the following six UN Sustainable Development Goals:

- No Poverty
- Good Health and Wellbeing
- Quality Education
- Good jobs and economic growth
- Reduced Inequality
- Responsible consumption

These policies and processes are informed by internationally recognised standards and declarations;

- The Base Code of the Ethical Trading Initiative
- The UN Universal Declaration of Human Rights
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The UN Guiding Principles on Business and Human Rights
- The UN Global Compact - we are participating member of the UN Global Compact which sets out 10 core principles, one of which relates to the elimination of all forms of forced and compulsory labour.

Employees are encouraged to report concerns using the available reporting channels, all reports are investigated and if applicable the relevant authorities contacted. Employees that report concerns whether openly or confidentially, will be taken seriously and receive full protection under our Whistleblowing Policy. All policies are available on our internal intranet.

Alternatively, for more information or guidance, or to report a case of modern slavery, Unseen / the government's Modern Slavery Helpline can be contacted on 08000 121 700

Tackling Modern Slavery - Our Business

We have focussed our drive in raising awareness of the issue amongst our temporary workforce, providing information and support to those affected, or potentially affected by modern slavery, and promoting and supporting modern slavery charities in the work they do to help the survivors of this heinous crime.

We have undertaken a risk analysis of all our brands, this identified that PMP Recruitment faced the highest risk of modern slavery due to the volume of temporary colleagues working.

In order to raise awareness we have and continue to;

- Provide Modern Slavery training for front line employees and clients (as requested)
- Display and promote the Modern Slavery Helpline & Stronger Together - online, via worker communications and handbooks and visual materials in our locations
- Publication of Cordant Group Confidential Helpline number on employee payslips
- Systems to prohibit employees using bank account that is not in their own name, unless proof of relationship with the account holder can be established
- Systems to monitor and flag high multiple use of the same home address

Unseen

We work in Partnership with Unseen and have participated in promoting the Unseen Modern Slavery Helpline number within our PMP business at clients premises via branded Hi Vis Jackets detailing the number. This was accompanied with a high profile social media campaign. PMP held multiple charitable events to raise money for and promote Unseen and the work that they do.

Hidden in Plain Sight

Employees from across our recruitment brands participated in the government think tank discussions throughout the year and provided feedback on Hidden in Plain Sight Campaign.

Stronger Together

Cordant supports Stronger Together, a multi-stakeholder initiative aimed at reducing modern slavery, particularly within labour supply chains. The following group companies are Stronger Together Business Partners:

- PMP Recruitment Limited - provides onsite managed service recruitment and is the largest employer within the group supplying up to 35,000 temporary colleagues a week;
- Cordant People Limited - provides recruitment services to over 2000 customers nationally
- Core Staff Services Limited (CSS) - provides recruitment services locally in Lincolnshire
- Premiere Employment Group Limited (trading as Premiere People) - provides recruitment services in Northern Ireland
- Cordant Security Limited - provides specialist security services
- Cordant Cleaning Limited - provides a complete range of cleaning services including daily office cleaning, transport cleaning and the provision of janitorial supplies.

All have uploaded evidence to publicly demonstrate their commitment to tackling hidden labour exploitation.

Our Training and Due Diligence

To ensure a high level of understanding of the risks of modern slavery and human trafficking we have mandatory e-learning for all of our employees involved in recruitment or the management of our supply chain. All frontline recruiters complete training and acknowledge their understanding via our Recruiter Compliance Principles.

Cordant raise awareness of modern slavery issues by publishing and emailing our Modern Slavery Statement to all employees and on the Group intranet, this is recommunicated annually.

Since last year, we have developed and launched a dedicated Modern Slavery microsite.

This is available to all employees and includes all training assets, policies and information on how to report any suspected / confirmed instance of modern slavery.

We have a half day Modern Slavery workshop available for employees and clients (on request) which covers:

- What modern slavery, human trafficking and bonded and forced labour are
- Identifies the benefits for tackling modern slavery to the individual, the team and the business/industry
- The impacts of modern slavery through examples
- How to deter and detect hidden exploitation including spotting the signs
- How to protect potential victims and evidence

Tackling modern slavery - our supply chains

All suppliers are issued with a copy of our Modern Slavery Statement, this is communicated at the beginning of our business relationship and reinforced as appropriate thereafter.

We expect the same level of commitment and high standards in tackling modern slavery from suppliers, contractors and business partners and as part of our contracting processes we will review evidence of their commitment to tackling modern slavery and expect all our suppliers to hold their suppliers to the same high standards.

Our Commitment and Raising Awareness

This policy reflects our continue commitment to providing training to increase awareness, enforcing processes and controls to ensure slavery and trafficking are not occurring in our business and supply chains. During the course of 2018;

- 673 permanent employees completed our online Modern Slavery training
- 9 half day Modern Slavery workshops have been run with 53 delegates attending
- 333 front line recruiters and managed service site teams completed our online Whistleblower training
- Provide Stronger Together information to all new applicants via posters, web links, handbooks
- 3 potential cases of exploitation were spotted and highlight to the authorities
- PMP continued to support Unseen as their charity of the year, working in partnership to raise awareness, promote the charity across the Cordant Group and to their client and to raise funds
- We continue to work with Medaille Trust to source employment opportunities in the North West for survivors of Modern Slavery

Impact & Monitoring

We report quarterly to our individual brand SMT and Executive teams on:

- Number e-learning modules completed
- Workshops delivered and attendee numbers
- Confidential helpline calls identified as potential Modern Slavery
- Any engagement with GLAA, Police or NCA
- Any NGO / government engagement relating to Modern Slavery
- Number of multiple occupancy addresses identified
- Number of shared bank accounts identified
- Number of clients influenced to consider Modern Slavery as a risk in their supply chain
- Number of duplicate "Next of Kin" details identified

Our Plans for 2019

We are committed to reviewing and improving what we do each year to prevent modern slavery and human trafficking. Our 2019 initiatives will build on our work so far and will target brands in order, as identified in our risk analysis. This year we will continue to:

- Ensure that all frontline recruiters and site teams in all brands are aware of the tools available to them including the Modern Slavery intranet
- Work in partnership with Unseen to raise awareness through our social media streams and fundraising events
- Develop relationships with organisations who support survivors of modern slavery and human trafficking
- Work with clients to provide support and guidance to limit risk
- Work with government and NGOs to develop strategies to remove risk from the sectors we operate in
- Increase internal awareness on identifying and reporting incidents of modern slavery and human trafficking and we will improve by:
 - Providing reminders and training utilising technology - hangouts, Google +, social media
 - Selecting Unseen as a Cordant Group charity partner, supporting and promoting their work across the group
 - Issue our newly developed a supplier code of conduct throughout our supply chain
 - Review our upwards supply chain to ensure Modern Slavery statements are available

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending December 2018.



Chris Kenneally
Group Chief Executive Officer



Date

Signed on behalf of the Board of Directors of Cordant Group plc, who have read and authorised the publication of this statement

Further information on modern slavery:

<https://www.unseenuk.org/modern-slavery/facts-and-figures>

<http://www.nationalcrimeagency.gov.uk/publications/national-referral-mechanism-statistics>

<http://www.gla.gov.uk/>