



Modern Slavery Statement

A) ORGANISATION

This statement applies to all companies within and associated to STC Maintenance (referred to in this statement as 'The Company'). The information included in the statement refers to the financial year ending 2019.

B) ORGANISATIONAL STRUCTURE

We are Facilities Management company based in the UK, our Head Office and shared service function is based in Hull and we have 4 Branches Nationwide.

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C) DEFINITIONS

The Company considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

E) POTENTIAL EXPOSURE

The Company considers its main exposure to the risk of slavery and human trafficking to exist in its use of contractors to fulfil its activities as they may not be fully compliant with legislation in the UK. We aim to minimise this risk by requesting the completion of a contractor questionnaire and by ensuring we communicate a zero tolerance approach to modern slavery.

In general, the Company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

F) STEPS

The Company carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting an annual review of the controls of its suppliers.

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery. In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:

- Reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- measures in place to identify and assess the potential risks in its supply chains;
- Embedding a culture of zero tolerance towards modern slavery;
- Raising awareness with our employees.

G) KEY PERFORMANCE INDICATORS

The Company has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the group or its supply chains.

- All contractors are required to complete a contractor questionnaire both at the commencement of the contract and annually thereafter .
- All employees are made aware of the Anti-Slavery and Human Trafficking Policy.

H) POLICIES

The Company has the following policy which further defines its stance on modern slavery:

- Anti Slavery and Human Trafficking Policy

I) TRAINING

The Company provides induction training which includes awareness of this Modern Slavery Statement and the groups [Anti Slavery and Human Trafficking Policy](#). We are also currently creating an e-learning awareness module for all staff to complete on an annual basis.

J) SLAVERY COMPLIANCE

The Companies HR Manager holds responsibility for Slavery Compliance, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the group obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 19th August 2021



A. M. Fox

Andrew Fox
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