

# Modern Slavery Statement 2022

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# 1.Introduction

March 2022

**Our progress report for 2021 comes amidst the backdrop of a global Covid-19 pandemic, substantial changes to the UK employment market, migration shifts and the impact of Brexit now being truly felt in the UK. Now more than ever we need to remain vigilant to the risks of modern slavery as organised gangs invariably change their approach to exploiting and abusing labour and the vulnerability of victims increases.**

People are the principle focus of our organisation, our culture and values remain resolute and will continue to be engrained in our organisation as we continue to grow.

Our values are clear:

- We listen
- We care
- We solve problems
- We are approachable
- We challenge

We supply sectors that are high risk for exploitation, human trafficking and modern slavery. We remain abreast of the latest intelligence and regularly attend workshops, seminars and training sessions to ensure our knowledge remains current and that we continuously improve our processes, procedures and practices as the threat of modern slavery evolves.

We have a moral and legal obligation to go above and beyond in our pursuit to identify, support and rescue potential victims, whilst adopting a zero-tolerance approach towards anyone suspected of committing offences.



Our ability to adapt and move forwards in challenging market conditions has helped us to continue to grow and thrive in a challenging recruitment environment. As our team expands, our risk also increases so we are proportionately increasing our in-house compliance checks, audits and inspections whilst also increasing the training our team receive to ensure they remain vigilant.

The Covid-19 pandemic has evolved the way we recruit, work and live and therefore presents new challenges in our fight against modern slavery and has been specifically covered within our risks in Section 4 of this statement.

Responsible Recruitment is more than a strapline for ALS People, it is a culture and ethos we continue to spread amongst our people, our customers, and our workforce. This culture helps to reduce our exposure to modern slavery by promoting active engagement with the workforce, a principle of 'if in doubt, shout' and ensuring our workers feel supported and encouraged to speak up if they feel their wellbeing is at risk.

Alongside this, we have created bespoke marketing campaigns aimed specifically at our workforce, who may not realise or feel empowered to raise concerns about their wellbeing. We will continue to increase our communication in this area.

We have increased our collaboration with our customers and worked in partnership to tackle modern slavery. We will ensure we learn from the large companies in the industries we serve, taking inspiration from their initiatives, goals and objectives to work towards a collective goal of eradicating slavery. Where we successfully rescue victims of slavery or prevent risk to our workers, we are committed to talking openly with our customers, suppliers and colleagues about this to help raise awareness.

As our business evolves, we continue to work closely with trusted suppliers and partners to improve their ability to identify and manage the risks of modern slavery. We will continue to audit our supply chain and go further by investigating the 2nd and 3rd tiers of higher risk suppliers, for example of PPE supplier with foreign-based secondary or tertiary suppliers (see Risk Profile in Section 4).

We continue to work closely with Slave Free Alliance, Stronger Together and Hope for Justice to help ensure we remain diligent and focused on eliminating the risks of modern slavery. We are also signatories to the Welsh Government's Code of Practice for Ethical Employment. We have ensured a transparent and collaborative approach with these organisations, embracing their knowledge and training to ensure our team, suppliers and temporary workers are fully engaged and willing to raise concerns about welfare issues.

On top of previous initiatives, our poster campaigns, social media posts, eLearning packages, bespoke training from Slave Free Alliance, worker booklets, PPE campaigns and other initiatives continue to ensure our culture is clear. We will be responsible, ethical and transparent and we will protect our workers above all else.

**We feel it is integral to our business to continue to do more, so as we review our objectives set out in 2021 and reflect on our successes and learnings during that period, we also set out specific measures to achieve in 2022 and beyond.**



## 2. Our business and supply chains

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We operate a 'hub and spoke' model of recruitment, having never seen a branch-based model as being the future of recruitment, we continue to run our business with limited office infrastructure. This approach has substantially grown our own team during 2021, whilst also increasing our operations into areas including the Midlands, Northern Ireland where our presence historically has been much smaller. As such, 2021 saw our fastest period of growth and new starters in our team.

Our Head Office in Caerphilly, South Wales supports operations throughout the UK. We utilise a selective panel of partner recruitment agencies to support national contracts, allowing us to provide innovative solutions to public and private sector customers across the UK.

Our regional teams operate onsite or work from home, ensuring geographical coverage across large parts of the UK. This team has grown by over 85% throughout 2021 and we have increased our 2nd tier line management function to support this growth. We have a proactive approach to internal training to ensure our team, particularly those that deal with temporary workers daily, are fully aware of the risks of modern slavery. We have also introduced a suite of eLearning alongside specific KPI's linked with this area.

We have grown our central compliance resources to ensure we control, coordinate and manage our temporary workforce and provide additional compliance checks to further reduce the risk of modern slavery. Our payroll procedures, compliance checking, onboarding process and ongoing interaction with the workforce ensures we have regular engagement, check the welfare and support our people.

The Covid-19 pandemic has inevitably increased our risk of modern slavery, from practices such as 'bubbling' affecting social interactions through to the ability for candidates to open bank accounts being restricted during lockdowns, we have seen an increased risk of modern slavery exploitation and proactively sought to tackle this.

As our middle layers of management grow, our culture remains integral to all that we do. We need to ensure that our culture remains one of openness, fairness and equality, promoting the wellbeing of our colleagues, workers and customers at every opportunity. An increased focus on training for new starters is part of our objectives for 2022 to ensure we recognise that as our team grows, our risk also grows.

In addition, in June 2021 we obtained a licence to allow us to supply sectors regulated by the Gangmasters and Labour Abuse Authority (GLAA). We feel this is a reflection that our policies and procedures are robust. However, as we supply sectors such as food manufacturing, we also recognise the role of the GLAA in those sectors and remain vigilant of the risks of modern slavery.



### 3. Policies, procedures and corporate governance

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Our commitment to eradicating modern slavery is weaved into many of our internal policies and procedures to ensure it remains relevant and a high priority in all our activities.

#### People policies

We cover all aspects of our employee journey (both temporary and permanent colleagues) including:

- Recruitment and Eligibility to Work
- Conduct
- Welfare and Wellbeing
- Whistleblowing
- Performance Management

Our people policies are further embedded into our ISO9001:2015 accreditation, ensuring we engrain quality standards into all that we do.

#### Supplier policies

We are a predominantly service driven business so have a limited supply chain. Strict controls are in place to reduce our risks, including:

- Annual Supplier Audits
- Requirement to demonstrate modern slavery policies
- Suppliers approved at board level
- Ethical Sourcing Standards (where relevant). Suppliers are risk assessed and an appropriate monitoring plan is agreed at board level and reported quarterly.

We completed a large number of remote audits in 2021 as the pandemic meant we were unable to meet all our suppliers face-to-face. However, in January 2022 we commenced a programme of personal inspections on our suppliers, including unannounced audits to ensure their practices remained in line with our expectations.

The pandemic had an impact on the financial viability of a small number of our supply chain, resulting in a consolidation of suppliers.

#### External verification

We utilise external HR support to verify all policies and procedures and to identify further initiatives we can introduce to learn best practice from larger organisations. We review our own statement and policies against the actions of larger corporations and industry leaders in all sectors, including entities with large supply chains, significant reliance on temporary labour as well as similar profile companies to our own. Our procedures are reviewed annually by Slave Free Alliance to ensure we remain at the forefront of the fight against modern slavery.

**We have attended a variety of seminars provided through our membership of Slave Free Alliance. We learn from our peer group and examples of excellence in the sectors we service and have taken key learnings into our business.**



### Responding to concerns

We have increased the number of communication points with our workforce and provided additional mechanisms for them to ask for help. These include:

- Internal whistleblowing helplines
- Hope for Justice contact details
- Escalation contacts for complaints about ALS staff treatment
- Customer specific whistleblowing helplines
- A staff handbook

We recognise that any report of modern slavery from within our workforce presents a fluid and evolving circumstance and that it is difficult to formalise a decision tree or flow chart for our team. As such, we have simplified our approach to any member of our team that feels they have a concern about the wellbeing of their workforce or colleagues to “if in doubt, shout”. This ensures that a Director takes personal accountability for resolving the concerns about modern slavery, with relevant support from external partners as appropriate.

In addition, proactive interviews with our workforce, held impartially to the Account Manager for that location have helped us to uncover potential welfare issues with our workforce.

### Corporate Governance

We have increased our Board of Directors to five Directors on Companies House. These individuals are integral to our business and hold key relationships with our larger customers. We have deliberately maintained a lean structure to our business, ensuring that a Director remains accountable for all customer interactions and maintains proximity to our customers to identify any areas for concern.

We increased our deployment of One-to-Ones, appraisals and a company wide incentive plan, with specific measures on compliance, modern slavery and worker wellbeing to ensure this is a clear discussion point during all formal interactions with our team.

### Compliance

The team that faces our temporary workers are regularly trained on our policies and procedures in relation to modern slavery, with annual refresher training scheduled again for early 2022.

Regular refresher training and spot checks are completed to ensure ongoing awareness. Quarterly appraisals, regular seminars, external training, online training and additional communication all help to ensure our staff remain aware, diligent and empowered to challenge any concerns.

Our head office team remain impartial from any Account Manager, reporting directly into the Financial Controller. Additional verification helps to reduce our risks further. We have invested in our CRM system to ensure we can prevent duplicate records, bank details and other information from being entered.

Regular due-diligence reports are circulated to ensure we continue to monitor information, these are reviewed weekly.

## 4. Assessing, managing and mitigating risk

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### High risk sectors

ALS supply temporary workers to sectors that are deemed to be high risk and targeted by gangs looking to infiltrate an organisation with victims of modern slavery. A substantial number of recent prosecutions and cases have involved warehouse and waste management facilities as well as recruitment agencies.

We recognise that the nature of the roles and the workforce typically used in these sectors means we are more likely to be targeted and therefore need to remain diligent. As such, we need to raise our standards to ensure we are not a 'soft target' by utilising a three-pronged approach:

### Customer awareness

Increasing our customer awareness of the risks of modern slavery will help ensure we work collaboratively with them throughout our tenure. Completing joint assessments of the risk, concerns and methods of infiltration of the labour force. Completing collective welfare checks on the workforce and encouraging random dip-sampling and checking on the entire process of the candidate journey with ALS. Joint training sessions will also help encourage dialogue, shared learning and engagement on the topic.

### Candidate awareness

We recognise that many victims do not recognise that they are indeed the victim of modern slavery or human trafficking, so we have increased our engagement with the workforce with specific 'Spot the Signs' campaigns and demystifying the language around modern slavery through simple, easy to understand and engaging literature, training and communication on our sites. Specific helplines for workers to report welfare concerns and proactive welfare interviews are regularly conducted by an impartial member of the ALS team.

### Employee awareness

We have increased our team by over 40% since 2020 and as such have a renewed focus on ensuring our recruiters and Account Managers ask open questions and understand the reason 'why' we do certain things in the way we do them. We also ensure they understand the implications of modern slavery and our approach to tackling it will help guarantee our culture remains consistent as we continue to grow.

To increase awareness, we have continued to utilise:

- Bespoke posters in multiple languages
- Confidential whistleblower hotline
- External audits from Slave Free Alliance and other organisations
- Toolbox Talks, seminars and training for all staff
- Digital learning content
- Unannounced and random auditing

### Fulfilment at peak

We continue to encourage our team to engage with our customers early regarding peak fulfilment periods as a vital element of our modern slavery strategy. The effect of Brexit on the availability of temporary workers has been softened by the increased unemployment from the Covid-19 pandemic, however we still feel it is more likely than not that our team may feel pressured to 'fill shifts' during peak periods by whatever means necessary, which leaves us susceptible to the risks of modern slavery.

During peak periods, our compliance team will increase proactive audits to ensure we minimise this risk for our own business. In addition, targeted poster campaigns, worker engagement and surveys have been launched on customer sites to raise awareness of modern slavery and encourage reporting of welfare concerns.

**Modern slavery awareness forms part of our broader strategy on empowering our people, ensuring we maintain our ethics and standards, promoting equality and fairness in all that we do. We need to continue to do more to maintain control, structure and discipline in all facets of our business to remain at the forefront of reducing the risk of modern slavery.**

#### **Covid 19**

Processes implemented to protect workers from the risks of Covid-19, such as bubbling groups, ensuring those who travel or live together, work together. Face masks and PPE, alongside remote recruitment will inevitably have increased the risk that victims of modern slavery are unable to talk freely to those outside of the gangs or other victims. The limited social interaction within a workforce will protect that workforce from Covid, but inadvertently also increases the risk that victims will have less opportunity to talk to a trusted colleague, account manager or supervisor.

In light of this unprecedented issue, we have increased remote welfare checks, text messages, campaigns, posters on the back of toilet doors, in canteens, media messages on our clocking-in machines, pocket guides, leaflets in canteen facilities and one-to-one interviews to ensure we maximise the opportunities for our workers to talk to us.

#### **Supply chain**

##### ***Recruitment agencies***

We utilise a small and selective number of recruitment agencies to support our business on national contracts. These partner agencies are vetted prior to usage and we have robust procedures for adding new suppliers to our panel. We have increased the level of auditing we complete on our supply chain of recruitment agencies to every six months (from every year) but also ensure that all workers they supply are transacted via our platform for us to complete additional checks directly with the workforce.

Workers, irrelevant of supplier, are included in modern slavery workshops we complete with customers and can reach out to ALS and 3rd Party confidential whistleblowing helplines.

We set high expectations of our own business and ensure we cascade this same standard to all of our suppliers. We extend our control measures and knowledge to our supply chain to help further reduce the risks of modern slavery and protect our customers and workers. Suppliers are verified, credit checked and audited to ensure compliance at regular intervals. Suppliers who are unable to demonstrate continued competency in this area are removed from our estate and black-marked against future usage.

##### ***Personal Protective Equipment***

Our PPE is sourced through a Welsh-based, locally owned supplier to ensure we can control an area of our business where we feel there is an inherent and well publicised risk. We recognise that our PPE supplier source products from overseas, including the Far East, and will increase our modern slavery checks to include the secondary level of their supply chain where possible. We have regular dialogue with the senior management team at our PPE supplier to ensure they are aware of the risks of modern slavery and complete a variety of diligence checks on their supply chain.



## 5. Due diligence

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We complete regular and proactive welfare checks with our workers as part of our modern slavery due diligence. This helps to raise awareness to our staff, provides a deterrent to potential gangs and provides an opportunity for early intervention in cases where we have concerns for the wellbeing of a colleague or worker.

These due diligence checks are completed by a senior member from our team, not directly involved in the running of the relevant contract, ensuring an impartial view to encourage dialogue from the workforce, whilst also protecting our business in the scenario of a 'good egg, gone bad' scenario, based on intelligence on cases involving other recruitment agencies.

Additional due diligence checks are completed with workers, either selected at random or based on system generated 'flags'. Flags could include shared bank account details, shared addresses or similar. These are often legitimate (student housing, cohabiting partners etc) but are seen as potential signs of victims of slavery

The robustness of our processes was demonstrated in January 2021, when one of our agency workers at the Cory MRF was identified as being a potential victim of modern slavery during a regular welfare check. The potential victim had only been working with ALS People for three weeks.

Immediately following the welfare check, ALS People acted swiftly to safeguard the potential victim, moving them to a safe location and providing a bank card to use. ALS People undertook daily welfare checks over the course of a week before the victim was moved safely to another part of the UK with help and resources from the Salvation Army. The police were also involved, and a police investigation was undertaken.

The ability for ALS People to identify the victim and to free the victim from modern slavery is testament to its proactive and rigorous welfare checks. It also exemplifies the positive culture and working environment which ALS People had created and which was present at the Cory MRF amongst its agency workers and staff. Having a positive culture and working environment were critically important as it gave the victim the confidence to speak up and ask for help.

Throughout this time, from the point at which the victim had been identified as a potential victim and throughout the gap analysis, ALS People and Cory continued to operate as one team to ensure that all required resources to assist the victim were made available and to support a thorough investigation into the matter.

Once the victim's safety had been assured, ALS People requested Slave-Free Alliance to undertake a gap analysis of the situation. The purpose of the gap analysis was to understand what further, if anything, ALS People could have done so to enable the victim to have been identified earlier in time—noting, however, that the victim had only been working with ALS People for three weeks.

The Slave-Free Alliance gap analysis found that:

- ALS People clearly demonstrated that it took a proactive approach to understand and tackle modern slavery. Slave-Free Alliance identified that the ALS People had in place strong preventative actions. These included the training it provided to its Account Managers, controls implemented within its recruitment processes, intelligence capabilities, and its worker welfare interviews—which was the critical action which enabled ALS People to identify the victim within a very short period.
- ALS People had in place several best practice actions. These included:
  1. Having modern slavery awareness posters and other materials displayed in prominent locations across the sites where its workers were placed, such as the Cory MRF. These materials were multi-lingual and informed readers about slavery indicators.
  2. Actively engaging with its workforce and treating its temporary workers as permanent employees. Account Managers and Team Supervisors also played vital roles instilling the business's culture and values among the workers. The benefits of this positive engagement were seen at the Cory MRF, where there was (and continues to be) a sound level of worker retention, which reduces modern slavery risks.

3. Only sourcing Cory MRF workers directly, rather than through other labour agencies, thus removing the risk of modern slavery seeping from a supply chain.

**ALS People demonstrated a strong capability in gathering and assessing relevant information, safeguarding and responding to the needs of victims, and strong leadership which assumed responsibility to coordinate the response and ensured the welfare of its workers were paramount throughout the process.**

*"Cory and ALS People's proactive approach to tackling modern slavery was instrumental in identifying and addressing a victim of modern slavery. Their victim-centred approach and welfare provision inspired trust and confidence for the victim to support a police-led investigation against the traffickers."*

Gary Booth, Technical Services Manager, Slave-Free Alliance

This experience was a confronting and difficult reminder of the high risk of modern slavery and human trafficking in the UK waste and manual labour sectors. Modern slavery is a hidden crime—in fact, whilst nearly 11,000 victims of modern slavery and human trafficking were identified last year<sup>1</sup>, Slave-Free Alliance and academic studies have estimated that there are as many 136,000 victims in the UK, with many more trapped in exploitative situations.<sup>2</sup>

In this context, the ability for ALS People to identify and protect the victim is highly commendable and it gave Cory confidence of the robustness of ALS People's culture, actions, and processes.

Cory and ALS People continue to have a collaborative and transparent working relationship to ensure that any other potential victims are also able to be identified swiftly and protected from further exploitation or harm.



<sup>1</sup>Source: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/970995/modern-slavery-national-referral-mechanism-statistics-end-year-summary-2020-hosb0821.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970995/modern-slavery-national-referral-mechanism-statistics-end-year-summary-2020-hosb0821.pdf)

<sup>2</sup>Source: Slave-Free Alliance.

## 6. Training and development

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We made several commitments to increase our training during 2021 and intend to extend that further in 2022 based on the feedback from within our team. Our team found the external sessions insightful, emotionally challenging and thought provoking.

### Internal training

We have a programme of internal training including:

- Online learning course on modern slavery for all staff and temporary workers
- Slave Free Alliance training for both line managers and frontline colleagues
- Tier 2 line managers are specifically targeted under agreed KPI's on completing spot checks, audits and interviews with the temporary workforce

We continue to upskill our team, particularly as our middle management team expands, to ensure we are open, transparent, vigilant and challenging and continue to live to our principles, values and ethics. Additional training, created by Slave Free Alliance and aimed at the sectors we serve, has been programmed for 2022 and forms part of our objectives.

### External training

We have engaged with Slave Free Alliance and completed a programme of gap analysis, seminars and webinars. These will be expanded in 2022 to include more of our customers attending alongside ALS colleagues to increase their awareness.



## 7. Tracking our progress

In 2021, we committed to a series of actions to improve our awareness, policies and procedures in incorporating a broader approach to tackling modern slavery. Progress on those actions is outlined below:

Action	Progress	Next Steps
We will improve the communication we provide to customers prior to supplying them with temporary labour, ensuring they mirror our standards on modern slavery and provide suitable welfare facilities for the workforce.	Formal SLA document released June 2021 prior to any new contract sign-up, including confirmation of facilities, welfare, wellbeing initiatives, supervision, direction and control. Signed by all parties prior to supply of labour.	Annual Review.
We will improve the literature and posters we display around customer sites, ensuring we provide independent advice and hotlines for workers to report concerns.	Posters aimed at raising awareness amongst our workforce released to all sites, placed in strategic locations on site.  Followed up by a round of welfare interviews to ensure they were visible and increased awareness of modern slavery.  Pocket book issued to workers to take away, with contact details for ALS and various helplines should a victim need support.	Refresh of posters in 2022.
We will regularly review our progress in all areas with customers and share transparently our findings, objectives, and goals.	Increased collaboration with key customers, ensuring transparency on welfare checks, supplier due diligence and resources.	
We will create champions in areas such as modern slavery, gender equality and protecting vulnerable groups to ensure these remain at the forefront of our strategic vision.	Monthly Regional Ops Manager call introduced, modern slavery a specific agenda item. Added modern slavery to quarterly appraisals.	Expand to a worker council, ensuring our messaging and comms to workers is relevant, easily understood and accessible.

We will be transparent with customers where we utilise a broader supply chain and ensure they maintain similar standards of compliance and diligence.	Full supply chain mapping in place with specific T&C's. Customers receive transparent invoicing outlining supplier, margin and management fee from ALS on a weekly basis.	None required.
We will work with our suppliers who source goods from overseas, ensuring we map potential risks and aim to reduce our exposure to these, even if it means an increased cost to us.	PPE supplier audit completed 2021.	Expanded audit booked for March 2022 to review 2 <sup>nd</sup> tier supplier base.
We will integrate increased communication on modern slavery into our induction and onboarding procedures and review this information on a quarterly basis.	Specific content added to all inductions on modern slavery.  eLearning course created and completed by all ALS staff.  Additional posters and signage placed on sites.	Ongoing review.
We will engage customers on modern slavery to ensure they are aware of their risks.	Seminars and gap analysis completed with 2 x larger customers.  All customers engaged about modern slavery and their own obligations.	Gap analysis to become an annual event with larger customers.
We will encourage customers to participate in external seminars, including Slave Free Alliance workshops alongside ALS.	Customers have attended SFA webinars and training sessions with ALS in 2020.	Encourage customers to join SFA independently of ALS and attend workshops and collaborative sessions with ALS.



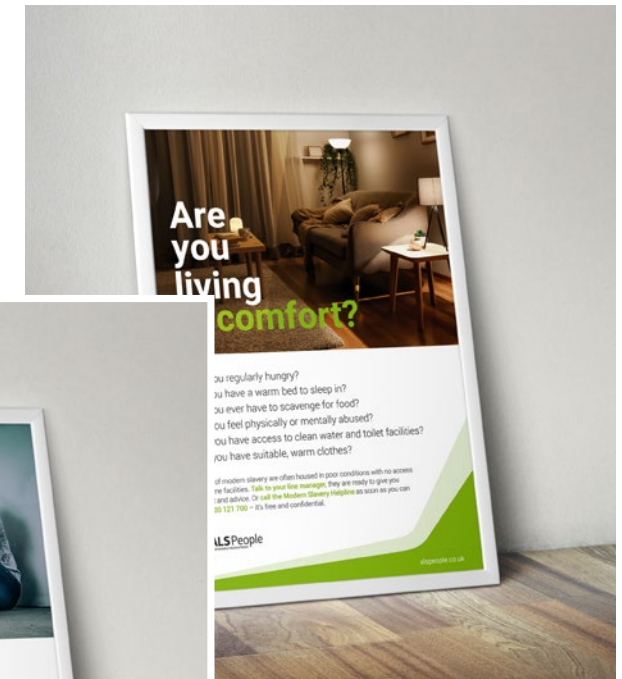
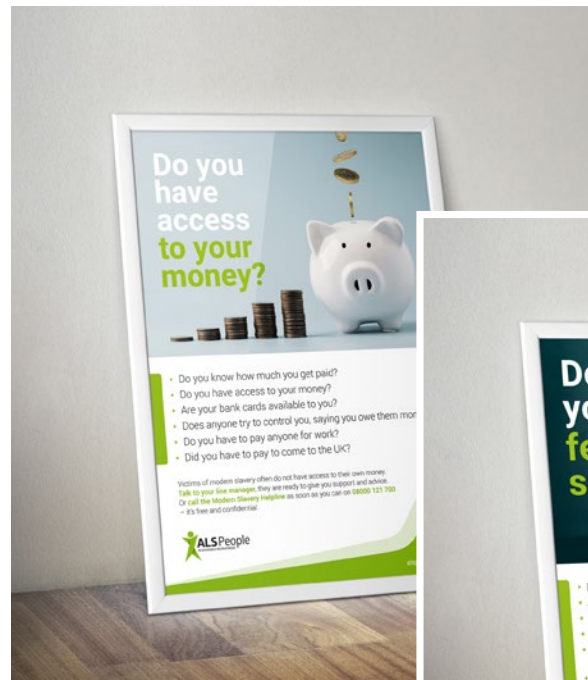
## 8. Our campaigns

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### Posters

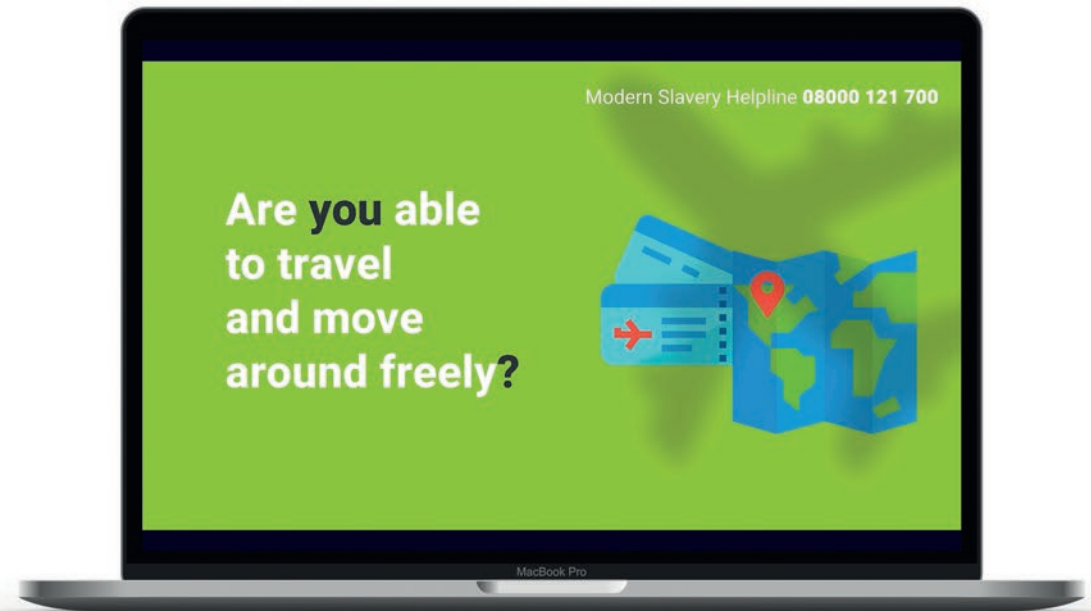
Our activity to help abolish modern slavery extends beyond educating our management teams and permanent employees. We have also created bespoke communications campaigns including eLearning videos, posters and booklets focused on supporting potential victims of modern slavery to recognise the signs of forced labour and exploitation and to reach out and seek help.

These posters are positioned in areas where they are most likely to be viewed by temporary workers such as on the back of toilet doors and in canteen areas. They feature information, advice and confidential helpline numbers for anyone with concerns.



### eLearning

These eLearning videos are short, easy to understand and can be accessed either on a mobile phone or laptop. They are aimed at helping potential victims recognise the signs of slavery and exploitation with clear messaging and the modern slavery helpline number featured throughout.



### Booklets

This pocket-sized modern slavery booklet was designed specifically for anyone to be able to quickly slip it into a pocket or bag. The booklet features information to help workers spot the signs to recognise whether they are at risk of or currently a victim of modern slavery and exploitation. There is advice for anyone with concerns detailed throughout the booklet including confidential helpline numbers.



## 9. Plans for 2022

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Our objectives in 2021 were ambitious. We want to continue to challenge ourselves to be better, more proactive and ultimately help reduce the risks of modern slavery to our own business, our customers, our workers and our industries. To help further this, we have also committed to the following in 2022:

- Increased system reporting on red flags, with a change of the frequency of reports from monthly to weekly.
- Increase awareness within our workforce of the signs of a victim, helping to promote to our workforce to raise any wellbeing concerns about a colleague on an anonymous basis.
- Increase audits of our supply chain to include second tier suppliers.
- Refresh our worker-focussed campaigns, ensuring they are aware of 'what a victim of slavery could look like', 'the signs of trafficking', 'the meaning of control' and similar messaging, recognising that some victims may not actually realise they are a victim.
- Expand the coverage and customer base involved in our gap analysis, raising awareness of the support from Slave Free Alliance and the benefits of them also joining the fight.
- A PPE campaign with branded messages on hi-visibility vests used on our customer sites to help raise awareness.





**This Modern Slavery Statement  
has been approved by the Board  
of Directors and signed by Steve  
Lanigan, Chief Executive Officer  
on 21/02/2022.**

