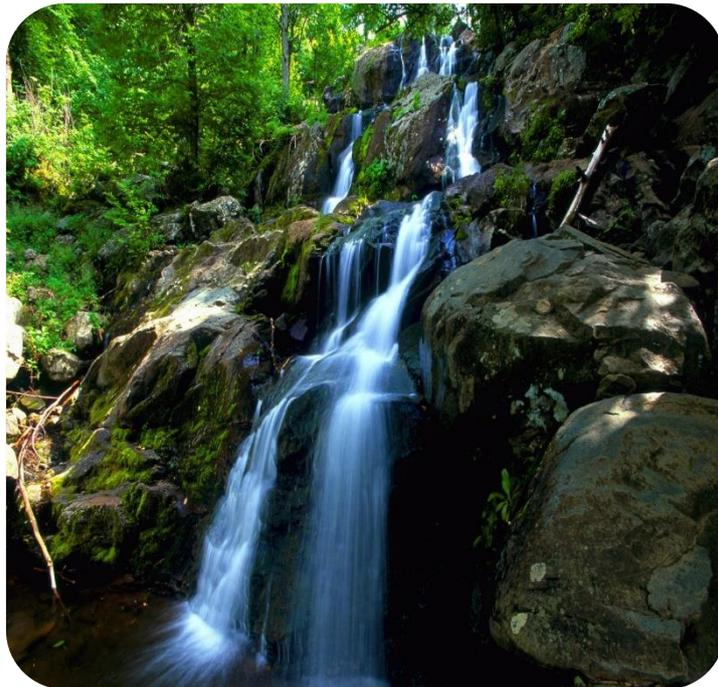


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## Lewis & Graves Partnership

### MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT



Policy Author: Jason Aves  
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## MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

| Review Date | Next Review | IMS Number | Document Number | Person Responsible                   |
|-------------|-------------|------------|-----------------|--------------------------------------|
| Jan 2020    | Jan 2021    | HR 28      | MSHTPS - 02     | HR & General manager - Tracey Parker |

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**Lewis and Graves Partnership Ltd Policy:**

**Lewis and Graves Partnership Ltd specialises in facilities management, predominantly focusing on contract cleaning services, to business and educational sector.**

- 2. Lewis and Graves Partnership Ltd is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of the management of its activities.**
- 3. Lewis and Graves Partnership Ltd adopts zero tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.**
- 4. We fully support the government's objectives to eradicate modern slavery and human trafficking.**
- 5. Our annual statement will provide information to supplement this policy, including details of our activities and supply chains and actions we are taking to support government.**
- 6. We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.**



Mark Graves Director

**Statement Introduction:**

- 1. Lewis and Graves Partnership Ltd specialises in facilities management, predominantly focusing on contract cleaning services, to business and educational sector.**
2. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2018.
3. This is our second annual statement and it contains a summary of progress undertaken within Year 2 of our current work plan. We continue to engage with a large number of private and public-sector organisations in pursuit of our regulatory interventions and our investment, procurement.
4. Our activities are usually undertaken at arms-length and take place solely in England. Our investment model is to support our clients in creating a clean and hygienic environment, for all building users to work within. such as registered providers of, public and private sector.
5. We occasionally undertake activities by working with local authorities and within a special purpose. Steps taken by Lewis and Graves Partnership Ltd since April 2017 – Year 2 of our work plan1

### Steps taken by L&G since April 2017 - Year 2 of our work plan:

Management responsibility and general awareness Responsibility for the preparation and publication of this policy resides with our General manager, Operations Director and Company Partners.

We have:

- ❖ Reported progress to our Executive Management Team and our company Partners.
  - ❖ Reconfirmed management responsibility for this policy and statement and received unanimous endorsement from our Executive Management Team and our company Partners.
  - ❖ Raised awareness of this published statement and the Modern Slavery Act by notifying organisations in our Frameworks, Delivery Partnerships and other companies with which we regularly engage.
-

**Risk Assessment:**

**Risk assessment**

We have:

- ❖ Completed a review of this policy and statement against our activities to establish whether the approach we have taken follows emerging best practice by:
  - ❖ Assessing and interpreting any recent or emerging case law and best practice; and
  - ❖ Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
  - ❖ Re-evaluating the risk of non-compliance as part of our cyclical Compliance Risk Register assessment.
- ❖ Undertaken a second risk assessment using our professional legal, risk, procurement and compliance team to determine our risk exposure.
- ❖ Reconfirmed that our primary risk is an association with a Framework participant or company with an ambiguous or non-compliant supply chain.

**Additional risk mitigation**

We have:

- ❖ Introduced new processes and procedures in relation to procurement and due diligence, as outlined later in this statement.
- ❖ Confirmed the applicability and enforceability of clauses and conditions included in our legal agreements and contracts.

### Supply chain and business due diligence:

#### Scope of our procurement activities

6. Our procurement activities take place in England; and our suppliers are predominantly UK and EU based.
7. Our total procurement spend for 2017 was £565,845
8. We place general reliance upon the Crown Commercial Service (“CCS”) and government procured supply chains for our consumable goods and operationally focused services. In a typical year we procure between £500,000 and £600,000 of goods and services through CCS framework companies.
9. In our own right we maintain a number of professional services and development Framework Agreements, which are made available to the wider public sector. We also maintain a number of other frameworks for exclusive use including legal services.
10. Within our company frame works we do not use labour-related supply chains for staffing our business.
11. In addition to the above-mentioned CCS framework-based companies we do purchase goods, materials and services from SME companies.
12. We maintain a direct supply chain framework with a large global company Bunzl plc, of whom have a Revenue geography:
  - ❖ North America 59%
  - ❖ Continental Europe 19%
  - ❖ UK & Ireland 14%
  - ❖ Rest of The World 8%

**See section 12a for Bunzl Slavery and Human Trafficking Statement.**

**Please note, permission to display Bunzl plc company logo and above statement within the Lewis and Graves Partnership Ltd Slavery and Human Trafficking Statement, was granted by Bunzl plc.**

12a.



**Slavery and Human Trafficking Statement for the 2016 financial year** This statement is made in accordance with Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps that Bunzl plc, its subsidiaries and operating divisions (together "Bunzl") are taking with a view to ensuring that slavery and human trafficking is not taking place in Bunzl's supply chain or in any part of its business.

**About us, our operations and our supply chain**

Bunzl is an international distribution and outsourcing Group with revenue in 2016 of £7.4 billion. We operate across 30 countries and are divided geographically into Business Areas covering North America, Continental Europe, UK & Ireland and the Rest of the World. Day to day management of the business, including procurement, is devolved to Business Area Heads in each of our operational geographies who are responsible, through the Chief Executive, to the Board of Bunzl plc. Although we are a decentralised Group which gives management autonomy to take decisions relating to our operations locally, our governance framework allows the Board to lead the Company in the right direction as we develop and pursue our future strategy, while ensuring that the tone of the Group's culture and values is set from the top and that the standards established by the Board are maintained throughout the Group. Bunzl employs c. 16,000 people in sourcing, consolidating and delivering a wide range of non-food consumable products across a variety of markets. We do not manufacture any of the products we supply, and our supply chain is both extensive, numbering thousands of suppliers, and dynamic as we respond to expanding customer requirements.

**Our commitment**

Bunzl is wholly committed to respecting human rights across both our own operations and our supply chain. We also take appropriate action to ensure that all our employees understand our policy of eliminating forced labour, child labour and human trafficking and aim to ensure that our suppliers apply this standard within their operations and their own supply chains.

**Bunzl's slavery and human trafficking risks**

The majority of our businesses are based in North America, Europe and Australasia and are involved solely in the procurement, consolidation and supply of manufactured goods. In our view, the profile of our operations in terms of locations and roles therefore means that the risk of the use of forced labour is low. The majority of our suppliers are based close to our selling companies, although we do import some products from lower cost areas, primarily south-east Asia, where we consider the potential risks of forced labour to be higher. In 2016 the Bunzl Risk Management Committee, chaired by the Director of Group HR, worked with consultants to complete a third-party risk assessment to establish direct and indirect social risks, including modern slavery risks in our supply chain to allow us to focus our attention and resources on the areas of greatest exposure to risk. Geographically those areas that were identified as having the highest potential direct risk were India and Indonesia whilst China, Mexico and Turkey also showed elevated potential risk. Products with the highest potential risk were those made from rubber, plastics, textiles, pulp and paper.

Continued on page 7.....

As a follow up to this work, we have initiated the following actions:

- We are strengthening our approach to communicate and enforce our Corporate Responsibility ('CR') policies in our supply chain by writing out to our suppliers, prioritising those in countries with elevated social risks, reminding them of our requirement that at least internationally recognised minimum requirements for workers' welfare and conditions of employment are met both by them and in their own supply chains (including any sub-contractors).
- We have set up a global sourcing working group with representatives from all of our business areas to provide greater transparency of social risks in our global supply chain and to coordinate and oversee actions planned and taken to mitigate those risks.

### **Policies in relation to slavery and human trafficking**

For over ten years, Bunzl has adhered to a comprehensive suite of corporate responsibility policies that cover key impacts to our business. Our Employees policy requires all businesses to develop policies which reflect the UN Universal Declaration of Human Rights and local legislative requirements together with other Group standards. Our Suppliers policy also requires compliance with internationally recognised minimum requirements for workers' welfare and conditions of employment as defined by the International Labour Organization or the Ethical Trading Initiative, which specifically prohibit forced labour i.e. slavery and human trafficking.

**Full details of our policies can be found in the Responsibility section of the Bunzl plc website.**

Our Employees policy is implemented and monitored by a team of human resource professionals and is reviewed by our internal auditors who periodically visit Bunzl locations and audit the operations to ensure that they meet the relevant standards. In addition, we have a "Speak Up" policy providing a dedicated confidential reporting mechanism where employees can raise issues of concern.

### **Due diligence processes in relation to slavery and human trafficking in supply chains**

The sustainability of our business is based on building long term partnerships with our suppliers. We have on a number of occasions written to the top 50% of suppliers by value to share policies on corporate responsibility to ensure their policies are compatible with those of Bunzl, including no forced labour within their operations or within their own supply chains.

In 2008 Bunzl established its Global Sourcing team, comprising a procurement office and a quality assurance and quality control team based in Shanghai, who perform regular audits of our suppliers in Asia with a view to ensuring that they meet international standards. In 2016 the Global Sourcing team completed 449 supplier audits covering more than 90% of our spend in Asia.

The team in Shanghai and the relevant Bunzl procurement professionals will work with suppliers to achieve acceptable standards in all areas of the audit, and where breaches are identified appropriate action is taken to address such breaches, in accordance with the Company's policy. Bunzl reserves the right to cease a relationship with a supplier if it is found that unacceptable practices are being employed at any sites used for producing or sourcing Bunzl products and those suppliers fail to make improvements over an agreed timeframe or make no commitment to making the improvements required. Regular reports are submitted to the Bunzl plc Board of Directors summarising the audits that have been carried out and the material issues that have been identified from such audits and the follow up actions taken to address such issues.

Continued on page 8.....

### Effectiveness and performance review

In 2016:

- 16 calls were received through our “Speak Up” line. None of these related to modern slavery.
- The Global Sourcing team performed 449 supplier audits covering suppliers in Asia. As a result of these audits, our Global Sourcing team has worked with 39 suppliers to improve their employment practices.

### Staff training

- All of our senior staff, including managers and procurement and sales executives, are required to complete the corporate responsibility e-learning modules that have been developed. These include information on our policies regarding corporate responsibility. Compliance is monitored by our HR departments.
- Our Global Sourcing team comprises professional auditors who and reporting social risks are trained in identifying.

### Looking ahead

Our objectives for 2017 are the following:

- Launch a corporate responsibility training module which specifically covers social risks, including modern slavery.
- Continue to ensure that our CR policies, including our requirements relating to social risks, are communicated and enforced adequately in our supply chain through communications with our suppliers and by expansion of our audit programme.

**Approved by the Board of Bunzl plc on 21 June 2017 and signed on its behalf by Frank van Zanten, Chief Executive.**

13. In common with many organisations, our directors, operations and sales teams occasionally stay in UK hotels when conducting business away from the office. Accommodation and travel arrangements are organised through a government procured travel agent with a publicly stated risk-assessed supply chain procedure. We occasionally procure meeting and conference venues to support our general business activities and these are selected to ensure good value for money. We note that the hotel and hospitality trade recognise the risk of modern slavery within their sector and a Stop Slavery Hotel Industry Network is being developed by the industry.

### Procurement and tender process improvements:

14. Existing tender documentation includes the mandatory exclusion of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.
15. To comply with government procurement regulations we support and use new electronic tendering (e-tendering) system. The initial phase of e-tendering continues to use the existing tender documentation and templates as attachments; however, we endorse companies that are exploring methods to embed key compliance questions into the software application to make use of the inbuilt evaluation functionality.
16. The tender Pre-Qualification Questionnaire (PQQ) process was replaced in September 2017 by a new requirement bringing UK practices in-line with those across Europe. This includes adopting a European Single PQQ, which is a centralised way for a bidder to submit 'suitability information' once and apply this to multiple tenders. Our compliance requirements outlined above have been retained and updated to comply with this new EU requirement.
17. We anticipate that the UK's departure from the EU may result in some changes to the way companies promote procurement opportunities within the UK and the remaining Member States; however, the process improvements described above are likely to continue for the next few years.

### Due diligence improvements:

18. As part of L&G Know Your Customer (KYC) due diligence process, the company subscribes to World-Check a database which provides wide-ranging information on organisations, including details of financial crime, bribery, corruption, human rights crimes and environmental crime convictions. L&G uses World-Check information to help inform its decision-making process and when onboarding new customers and procurement services.

**Expectation and encouragement:**

**19.** We expect all organisations within our Frameworks and other companies we engage with to ensure their goods, materials and labour-related supply chains:

- ❖ Fully comply with the Modern Slavery Act 2015; and are
- ❖ Transparent, accountable and auditable; and are
- ❖ Free from ethical ambiguities.

**20.** We encourage organisations within our Frameworks and other companies we engage in to read and apply to the 10 principals laid down in the publication between United Nations Global Compact and RICS

**The Ten Principals off the United Nations Global Compact:**

**Human Rights**

**Principal 1** Businesses should support and respect the protection of internationally proclaimed human rights.

**Principal 2** Make sure that they are not complicit in human rights abuses.

**Labour**

**Principal 3** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

**Principal 4** Thee elimination of all forms of forced and compulsory labour.

**Principal 5** The effective abolition of child labour.

**Principal 6** The elimination of discrimination in respect of employment and occupation.

**Environmental**

**Principal 7** Business should support a precautionary approach to environmental challenges.

**Principal 8** Undertake initiatives to promote greater environmental responsibility.

**Principal 9** Encourage the development and diffusion of the environment.

**Anti-Corruption**

**Principal 10** Businesses should work against corruption in all its forms, including extortion and bribery.

### Public reporting of non-compliance:

21. Individuals with evidence of non-compliance with the Modern Slavery Act in connection with L&G supply chains or businesses we engage with are encouraged to report their concerns to L&G General manager using the following address [lewis-graves.co.uk](http://lewis-graves.co.uk) or use the national reporting service below.
22. If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the Modern Slavery Helpline on 08000 121700.

### Steps to take - Year 3 - 2018/19:

#### Management responsibility and general awareness

We will:

- ❖ Report progress to our Executive Management Team and company directors.
- ❖ Continue to raise awareness of this published statement by re-notifying organisations in our Frameworks, other companies with which we regularly engage.
- ❖ Remind employees of our obligations under the Act.
- ❖ Prepare the third annual statement for publication April 2019.

#### Further risk assessment

We will:

- ❖ Undertake a within-year review of this policy against our activities to establish whether the approach we have taken remains proportionate and appropriate by:
  - ❖ Assessing and interpreting any recent or emerging case law and best practice; and
  - ❖ Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
- ❖ Working with our Framework suppliers to ensure escalation and notification of suspicious activity.

#### Ongoing risk mitigation

We will:

- ❖ Act promptly where a compliance breach has been identified or flagged.
- ❖ Continue to feed-back lessons learnt into the compliance risk management process.

**Appendix 1 - Information and contacts**

Lewis and Graves Partnership Ltd Website address: <http://www.lewis-graves.co.uk/>

Modern Slavery ACT 2015 <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

Slavery & Human Trafficking in Supply Chains: Guidance for Businesses  
<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

United Nations Global Compact (RICS) <https://www.rics.org/uk/>

Operations Director.....(James Abbott)

HR & General Manager.....(Tracey Parker)

Health & Safety Manager..... (Jason Aves)

Health & Safety Administrator.....(Sharon Wilson)

Compliance Manager.....(Ken Fairbairn)

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