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# SLAVERY AND HUMAN TRAFFICKING STATEMENT

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Issue: 4 Revision: 0  
Date Implemented: June 2016

**Prepared by:**

Name: Belinda Bishop

Title: Quality and Compliance Director

**Accepted by:**

Name: Paul Jacomb

Title: CEO

**Change/Review Notes:**

Date of Issue/Review	Issue:	Revision No:	Details of Revision
June 2016	1	0	First version
October 2018	2	1	General Revision
May 2019	3	1	Reviewed for audit, <ul style="list-style-type: none"> <li>CEO changed to Chairman</li> <li>Date and version updated</li> </ul>
March 2020	4	0	General review and revision of content



## SLAVERY AND HUMAN TRAFFICKING STATEMENT

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

We are a provider of Security, Cleaning, and Customer Service staff to a variety of clients in different industries and the group has its head office in the UK and all trading is carried out in the UK.

The group has an annual turnover in excess of £25m and the primary business is the provision of manpower under managed service agreements.

### Our Business

Our business is organised into a number of service sectors, STM Security, STM Cleaning, STM Rail, and STM Training.

### Our Supply Chains

Our supply chains include the sourcing of staff and uniforms principally related to the provision of the above services.

### Our Policies on Slavery and Human Trafficking

As an employer we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to the implementation and enforcement of effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk –

- We limit the geographical scope of our services to ensure optimum supervision of the use of our employees;
- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour;
- With regards to national supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

### Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Commercial and Customer Service Directors are responsible for compliance in their respective departments and for their supplier relationships.

### Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

### **Our Effectiveness in combatting Slavery and Human Trafficking**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion and agreement with STM Supplier Questionnaires (and the respective policies) for the top 5 areas of spend for the company and Internal Audits by an External Auditor and our own Quality Manager;
- Use of labour monitoring and payroll systems; and level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

A handwritten signature in black ink that reads 'Paul Jacomb'.

**Paul Jacomb**  
**CEO**  
**STM Group (UK) Ltd**

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