

2023

MODERN SLAVERY STATEMENT



At City, we recognise that Modern Slavery is a significant global human rights issue. With an estimated 49.6 million people globally and 130,000 people in the UK, at risk of human trafficking, sexual exploitation, and forced labour, it is the responsibility of everyone to ensure action is taken to end Modern Slavery. We are clear on our responsibilities within our direct operations and the role we have in the wider business community. We take a zero-tolerance stance on slavery and human trafficking.

As the risk of Modern Slavery increases, due to global issues such as climate poverty we are committed to having a sustainable supply chain in line with our policies, our standards, and our values.

At City, we drive our approach to Modern Slavery through our leadership team, values, and corporate social value commitments as part of our Economic, Social and Governance (ESG) strategy. Our approach to preventing Modern Slavery aligns with the following UN Sustainability Goals:



We are committed to acting ethically and with integrity in all our relationships and taking all reasonable action to prevent Modern Slavery. We also recognise we are responsible for raising awareness of Modern Slavery among our colleagues and suppliers.

Our Modern Slavery policy is communicated to our supply chain, and embedded in our Procurement Code of Conduct, Procurement Strategy, and day-to-day operations. We will outline how within our statement.



Our business



City Facilities Management Holdings Limited (City) is the holding company for one of the largest privately owned facilities management groups in the UK. This statement is made on behalf of City and all the UK companies in its group, specifically City Facilities Management (UK) Ltd, City Facilities Management (Distribution), City Facilities Management Ltd, City Facilities Systems Solutions Ltd, CBES Ltd trading as City Building & Engineering Services Ltd, and City Facilities (NI) Ltd.

City provides world-leading facilities management services. We believe that the name City is synonymous with professionalism, quality, customer service, and value. The importance we place on our relationship with colleagues and third-party stakeholders is vital to this reputation. We are committed to treating people fairly within our business and supply chain.

Our partnerships

[Scotland Against Modern Slavery](#)

We are proud members of a community of organisations actively engaged with Scotland Against Modern Slavery in fighting Modern Slavery.

There has been a sharp increase in the number of human trafficking victims across Scotland, with victims of Modern Slavery found in every local community area in Scotland. Current statistics suggest that one in four victims is a child and 70% of all victims are female.

Scotland Against Modern Slavery fights to create conditions to eradicate human trafficking and exploitation in Scotland. They provide end-to-end support to victims and maximise awareness of Modern Slavery to identify potential victims quickly and provide help.

We have further developed our partnership with Scotland Against Modern Slavery and actively contribute to their calendar of events. We are also establishing actions we can take to influence change. City has been an official corporate partner of Scotland Against Modern Slavery since October 2021, and we are proud to support Scotland Against Modern Slavery. Our ESG Director continues to attend monthly committee meetings to participate and gain further insight into actions the business community needs to take.

As part of our commitment to raise awareness in our communities, City partnered with Scotland Against Modern Slavery in 2023 to deliver presentations to over 400 secondary school pupils in the local community of our head office. These presentations covered topics, including understanding what Modern Slavery is, how prevalent it is in our community, and actions individuals can take to fight Modern Slavery.

[Service and Infrastructure Project Providers Modern Slavery Council](#)

The Director of ESG sits on the Service and Infrastructure Project Providers Modern Slavery Council. This new council comprises several facilities management and outsourced project providers to form a cross-industry group to tackle Modern Slavery, supported by the UK Government. The objectives of the new council are to work together to eradicate risk, remove crime, and help the victims of Modern Slavery through supply chains.

The group works to raise awareness within the industry, markets, and communities and share best practices to mitigate the risks relating to Modern Slavery.

In 2023, our Director of ESG was a member of a Steering Committee for the BSA Modern Slavery Council that produced a comprehensive toolkit to help businesses navigate the risks of Modern Slavery.

[The Toolkit for Tackling Modern Slavery in the UK Service and Infrastructure Project Sectors is now available on the BSA website.](#)

Our supply chain and procurement

Our supply chain is extensive due to the nature of our services across all of City's operations and our geographical spread across the UK. We have circa 2,000 suppliers and subcontractors across the three City businesses (City FM Ltd, CBES, City FM (UK) Ltd). We have a total annual third-party spend of over £200 million within our supply chain.

City strives to ensure that our supply chain remains free of Modern Slavery through our commercial and procurement practices.

In 2024, we plan to follow up with our suppliers with a more robust survey as we continue to improve our insight into our supply chain to detect instances of modern slavery and protect against it. In our updated survey we will ask probing questions to ensure our suppliers are aware of the increasing dangers of Modern Slavery.

[Pre-qualification](#)

In 2023, we implemented a new supplier onboarding solution, Alcumus SafeContractor, to support City with the onboarding and risk management of our supply chain. Alcumus SafeContractor is an industry-leading platform and a founding member of SSIP.

The Commercial and Procurement Team engage in conversations at the pre-qualification stage when working with suppliers and subcontractors to ensure they identify any high risks upfront. Pre-qualification helps to avoid engaging with suppliers and subcontractors that do not meet our standards or to support any we choose to work with to take corrective action.

All suppliers and subcontractors must pass our pre-qualification assessments. The pre-qualification process is repeated every year with all our suppliers and subcontractors. We review our pre-qualification assessments regularly to ensure the standards we expect of our suppliers and subcontractors reflect the latest policy and guidance.

Contracts

Our suppliers and subcontractors must acknowledge and commit to our zero-tolerance stance on Modern Slavery. We require all our suppliers and subcontractors to sign City contracts before we conduct business.

Our terms and conditions clearly outline our expectations for our suppliers and subcontractors. They must not knowingly engage in any activities that breach Modern Slavery or Human Trafficking regulations or cause City to violate any anti-slavery requirements. If any supplier or subcontractor breaches legislation, we will take immediate action and terminate relationships in line with our zero-tolerance policy.

Our Purchase Order Terms & Conditions also outline our expectations for adherence to the Modern Slavery Act 2015 for any one-off or low-value purchases. The T&Cs also outline the immediate action we will take should there be any breach.

We aim to deter any Modern Slavery breach in our supply chain with warranties, indemnities, and termination rights in these contracts.

Our sourcing methodology incorporates our Modern Slavery requirements within the Request for Information (RFI) process. Any supplier or subcontractor that does not meet our agreed criteria will not be shortlisted. Ensuring we do not engage with suppliers or subcontractors that do not meet our qualification requirements.

At City, we believe that working with our supply chain at the pre-qualification, tender, and contract stage is not enough. We identify those suppliers and subcontractors who are deemed to be high-risk, high-spend, and strategic, and work with them through the lifecycle of a contract or project via our ongoing strategic review meetings. These meetings focus on areas of risk, including Modern Slavery for which we review and monitor the Modern Slavery policies and actions to ensure that processes are in place to continue to meet our Procurement Code of Conduct requirements.

Our policies, procedures, and strategic plans



[Recruitment policies](#)

We protect the workplace rights of all our colleagues through our people policies. We manage recruitment via a Preferred Supplier List (PSL) of approved recruitment agencies that meet the City pre-qualification criteria and have signed a contract with us. Ensuring we only deal with reputable agencies that comply with all applicable laws. City always pays the recruitment fees associated with hiring a colleague or potential colleague.

We conduct Right to Work and Pre-Employment checks on all colleagues joining City. These checks include colleagues providing evidence that they have appropriate identification documents and that the bank account details provided belong to the colleague and not a third party. We investigate any discrepancies we identify thoroughly and take appropriate action.

[Whistleblowing policies](#)

We have a whistleblowing policy at City that all colleagues are encouraged to understand. We have a dedicated e-mail and phone number available for whistleblowing should any colleague suspect or be concerned about any potential fraud, corruption, or unlawful practices within City.

Should any case of Modern Slavery be suspected, we have an escalation process to ensure we thoroughly investigate and take appropriate action. In 2023, there were no cases of modern slavery identified.

[Procurement Code of Conduct & Ethical Trading Policy](#)

During 2023, we delivered a full re-draft of our Procurement Code of Conduct and introduced our Ethical Trading Policy. We will review these policies annually to ensure they remain up-to-date and relevant.



[Training](#)

At City, we are fully committed to tackling modern slavery head-on. We understand the seriousness of this issue and ensure that our teams are skilled and empowered to respond effectively. We've taken significant steps to further our mission.

In 2022, we introduced two new online modules: "Diversity, Inclusion & Belonging" and "Modern Slavery." These modules offer focused training and guidance on each topic, allowing our colleagues to explore in more depth the complexities of modern slavery while also promoting inclusivity within the business. The Modern Slavery module continues to receive overwhelmingly positive feedback, becoming one of the highest-rated modules in our online training suite. The module has significantly increased awareness of the dangers Modern Slavery poses to society and empowers our colleagues to take action against Modern Slavery.

Through ongoing training and communication, we are actively developing a culture of awareness within the business. We are committed to evolving our practices to address Modern Slavery in all its forms.

Compliance

Modern Slavery risk is recorded within our City Group Risk Register on our GRC tool. While each Business unit and function is responsible for the ongoing management of the risk of Modern Slavery, the Risk and Audit Committee oversees the group response. If inadequate measures are in place, they challenge the business on these.

The Governance, Risk and Assurance team performs ongoing control design reviews. These reviews ensure adequate mitigating, preventative, or detective controls are in place to reduce the likelihood of Modern Slavery events. They also ensure that mechanisms for reporting or detecting Modern Slavery-related events are in place.

These controls typically address risk at colleague recruitment and through the onboarding and ongoing management of third-party suppliers/subcontractors. The Governance, Risk and Assurance team periodically conduct independent audits to ensure that the relevant business controls are fully implemented and operate consistently and effectively.

Looking forward

- We are continuing to work towards EcoVadis Gold across all our businesses.
- We will continue to develop our partnerships with external agencies and organisations focussed on ending Modern Slavery, including Scotland Against Modern Slavery and Police Scotland.
- We will survey our suppliers with a new, enhanced questionnaire reflecting the heightened risk of Modern Slavery in society.

This statement has been published in accordance with the Modern Slavery Act 2015 and has been approved by the Board of Directors. It sets out the steps taken in relation to part 6, section 54 of the Act, by City Facilities Management Holdings (UK) Limited and other relevant group companies, during the financial year ending December 2023, to ensure that slavery and human trafficking are not taking place in its business and supply chains.

