

2024 Modern Slavery Statement

Introduction

Modern Slavery is currently recognised as one of the most significant global human rights issues of our time. With an estimated 49.6 million people globally at risk of Modern Slavery, this equates to approximately 1 in 150 people, including children who account for over 12 million of the victims. Over half of the victims are women and children. Modern Slavery can take many forms including human trafficking, sexual exploitation, and forced labour and is usually rooted in lack of social protection, poverty, and discrimination.

At City, we believe we have a responsibility to ensure that our colleagues are aware, informed and alert to this issue. We are clear on our responsibilities within our direct operations and the role we have in the wider business community, to ensure that we do all we can to prevent and detect instances of Modern Slavery. We take a zero-tolerance stance on slavery and human trafficking, and we are committed to having a sustainable supply chain which meets our standards, aligns with our policies, and matches our values.

We drive our approach to Modern Slavery through our leadership team, values, and corporate social value commitments as part of our Environment, 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 and detect Modern Slavery.

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

Our Business

City Facilities Management Holdings (UK) 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

We are proud Corporate Partners of Scotland Against Modern Slavery, working together with other businesses and organisations committed to fighting Modern Slavery in all its forms, sharing good practice across the corporate sector in preventing and detecting Modern Slavery, and committed to assist victims in Scotland to rebuild their lives.

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.

Current reports state that victims of Modern Slavery have now been found in every local authority area in Scotland. Current statistics suggest that one in four victims is a child and 70% of all victims are female.

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 the actions the business community needs to take.

As part of our commitment to raise awareness in our communities, City has also partnered with Scotland Against Modern Slavery 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.

BSA Service and Infrastructure Project Providers Modern Slavery Council

The Director of ESG sits on the Steering Committee for the BSA Modern Slavery Council (the Council). This council comprises several facilities management and outsourced project providers on a non-competitive cross-industry basis to tackle Modern Slavery, supported by the UK Government. The objectives of the Council are to work together to eradicate risk, remove crime, and support victims of Modern Slavery.

The group works to raise awareness within industry, markets, and communities and Our Director of ESG was proud to directly contribute to a comprehensive toolkit, published by the BSA Modern Slavery Council, to help businesses of all sizes navigate the risks of Modern Slavery.

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

Our supply chain and recruitment

At City we have an extensive supply chain 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 our City businesses. We have a total annual third-party spend of over £410 million within our supply chain.

Our Procurement function holds a critical responsibility in preventing Modern Slavery within our supply chain through robust commercial and procurement onboarding controls, engagement, and monitoring procedures.

Across 2025, we will be working closely with our supply chain partners to raise awareness, foster open dialogue, and deepen our collective understanding of risks through regular discussion and information sharing. Through partnership our impact is deeper, with a view to not only support in detecting modern slavery within the supply chain but also to ensure enhanced risk mitigation through all operations.

Pre-qualification

Furthermore, we will be developing further our onboarding systems this year, this includes continuing to partner with Alcumus SafeContractor, but also broadening our own information gathering and checks at the point of onboarding providing us with enhanced transparency to drive risk management and engagement with our supply chain.

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 timely and corrective action.

All suppliers and subcontractors must pass our pre-qualification assessments. This qualification process is repeated every year with 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.

Our contractual 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 regulations. 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 all relevant policies and procedures to ensure that appropriate processes are in place to continue to meet our Procurement Code of Conduct requirements.

Our policies, procedures and strategic plans

Contracts

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 which is maintained and reviewed at regular intervals to ensure that they 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 2024, there were no cases of modern slavery identified in our organisation

Procurement Code of Conduct & Ethical Trading Policy

Our Procurement Code of Conduct and Ethical Trading Policy are updated and support the critical processes and due diligence we have in place across our Procurement function.

Our People

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 have taken significant steps to ensure that our training and materials on this matter remain relevant and fit for purpose.

Our online Modern Slavery training module offers focused training and guidance. Allowing our colleagues to explore in more depth the complexities of modern slavery. This module continues to receive overwhelmingly positive feedback, becoming one of the highest-rated modules in our online training suite. Based on this feedback, it is clear that the module has significantly increased awareness of the dangers Modern Slavery poses to society and has empowered 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. While each Business unit and function is responsible for the ongoing monitoring of the risk of Modern Slavery, the Risk and Audit Committee oversees the adequacy of the management monitoring of risk management measures, to ensure that the business response to this risk is appropriate and consistent..

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 related events. They also ensure that mechanisms for reporting or detecting Modern Slavery are robust.

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

Looking Forward

- We will continue to develop partnerships with external agencies and organisations focused on ending Modern Slavery, including Scotland Against Modern Slavery, BSA Modern Slavery Council and Police Scotland.
- We are continuing to work towards Ecovadis Gold across all our businesses.
- We will use surveys, discussions and supplier partnerships to identify, assess and collaboratively mitigate the risks of modern slavery within our supply chain.

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 2024, to ensure that slavery and human trafficking are not taking place in its business and supply chains.

A handwritten signature in black ink that reads 'Colin Seggie'.

Colin Seggie,
Chief Executive Officer UK & Europe