BERENDSEN UK

Berendsen UK Modern Slavery Act Statement for financial year ending 31 December 2018

INTRODUCTION

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and is the statement of Berendsen UK Limited and its subsidiaries within the UK for the financial year ending 31 December 2018. This statement details the steps taken by Berendsen UK Limited and its subsidiaries within the UK to prevent slavery, servitude and forced or compulsory labour; and human trafficking taking place in any part of their business or their supply chains.

It is specified that this statement covers the steps taken by Berendsen Healthcare Limited, Berendsen Hospitality Limited and Berendsen Workwear Limited. Berendsen Healthcare Limited, Berendsen Hospitality Limited, Berendsen Workwear Limited and Berendsen UK Limited are together referred to as the "**Companies**".

As outlined in Berendsen UK Limited's statement for financial year ending 31 December 2017, Berendsen Limited (formerly known as Berendsen plc), sole shareholder of Berendsen UK Limited, was acquired in September 2017 by Elis SA, a company incorporated under French law (the "**Parent Company**").

Since then, the Companies have been part of the Elis group (the "**Group**") and continue to operate as before with the support of the Parent Company, in full consideration of the need for ethical business practices, including in respect of human rights and decent working conditions.

The Group's commitment towards ethical business practices is documented in the Group's Code of Ethics, launched in 2018, which the Parent Company continues to implement throughout its territories.

In particular, the entire Group is fully aware of, and committed to its legal and moral obligations towards preventing forced, bonded or compulsory labour and human trafficking.

Hence, the Companies (together with the Group) are committed to improving their practices with regard to the fight against modern slavery and human trafficking.

COMPANIES BUSINESS

The Companies deliver a complete textile rental and laundry service to customers engaged in all types of activities. The Companies offer everything from clothing to chefware, cloths, entrance mats, mops to bed and bath linen and hygiene equipment for public toilets. The customers which the Companies serve through their network of laundries and production facilities, are varied and generally carry out their activities in the following sectors:

- hospitality;
- healthcare;
- industry and commerce; and,
- services.

The Companies currently have over 6,000 employees within the UK (operating 36 facilities).

As a whole, the Group employs almost 50 000 employees in 28 countries and 430 operating facilities and posted consolidated revenues of 3.1 billion euros in 2018.

COMPANIES SUPPLY CHAIN:

The supply of goods, services and products to the Companies' business units is managed by the UK procurement department, with support and assistance from the Group's procurement function. The Group's procurement function deals with corporate social responsibility ("CSR") in order to assist local departments with selecting business partners.

Although the Companies' main business partners are located in Europe, the Companies source goods, services and/or product such as textiles from the Indian subcontinent and Asia, including Pakistan, Cambodia, Laos, Vietnam, China, Philippines and Bangladesh.

Important work is being carried out to rationalise the Group's panel of business partners. This work should facilitate the implementation of the Group's ethics values, including in regard to the fight against modern slavery and human trafficking.

ASSESSMENT OF MODERN SLAVERY RISK WITHIN OUR BUSINESS

The Companies believe that the main risks regarding modern slavery relate to the business partners, especially suppliers in higher risk jurisdictions.

A significant part of the Companies' supply chain is procured through the UK procurement and supply chain department. Concentrating the procurement of goods and services within one team results in better oversight of the Companies' supply chains. Furthermore, it ensures that the procurement process is carried out by a team who is duly trained and skilled in relation to ethical and responsible purchasing.

On that basis, and with the help of the Group's procurement function, the Companies rank, assess and manage their risks in relation to ethics by focusing on the higher risk countries from which they source products and textiles. The Companies therefore focus on their sourcing efforts in the Indian subcontinent and Asia in relation to suppliers selected by the Companies.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

The Companies have a zero-tolerance policy towards any breach of human rights, including modern slavery and human trafficking.

The Companies are committed to operate in accordance with the law and to promote the highest standards of integrity and share their values with employees and business partners.

The Group's Charter on Responsible and Ethical Purchasing, which is available on Berendsen UK Limited's website (<u>https://uk.elis.com/</u>), sets out the Companies' expectations of their business partners (such as suppliers) in relation to ethics, including in respect of human rights.

This Charter on Responsible and Ethical Purchasing has been implemented in 2018 within the Group's UK subsidiaries. It requires business partners to undertake to comply with its terms and therefore limit their environmental impacts, work for sustainable development and act ethically.

Specifically, this Charter requires the Companies' business partners to:

- recognise and respect the protection of internationally proclaimed human rights;
- abide and work in line with the United Nations Global Compact principles on human rights and labour;
- take part in the fight against any kind of corruption including extortion, bribery, influence peddling and facilitation payments;
- ensure the provision of a safe working environment for employees;
- <u>strictly prohibit the use of child labour or any form of slavery, forced labour and human trafficking;</u>
- ensure labour conditions are fair, employees are paid a regular salary in accordance with their employment contracts and the law, and all legal requirements are complied with; and,
- prevent any form of discrimination based upon any distinction such as race, gender, age, ethnicity, political opinion, origin etc.

In addition, the Companies benefit from a whistleblowing line supported by a procedure enabling employees to report and/or raise concerns internally to the compliance team and to disclose information which the individuals believe highlights or could indicate illegality, unethical behaviour or other serious wrongdoing, including any instances or suspicions of modern slavery.

DUE DILIGENCE AND MANAGEMENT OF MODERN SLAVERY RISK

The Companies support the implementation of their global policy with their business partners, mainly suppliers, through audits that may be carried out either directly by the Companies through the Parent Company or with the help of any independent audit company. These audits are intended to check that business partners are properly are applying the Group's ethics principles.

The Companies' internal processes are complemented by an assurance provider's independent audits which report levels of compliance among the Companies' business partners and alert the Companies to any areas that require improvement.

The Companies use an independent third party, QIMA, as an external expert assurance provider, to complete this screening and ongoing audit of suppliers to ensure that slavery and human trafficking is not taking place in their supply chains.

In order to ensure the efficiency of audit operations, the Companies are implementing the same audit methodology applied by the Parent Company. This audit methodology mainly comprises the following elements:

- the establishment of objective and explicit criteria to assess how strategic a business partner is to the relevant Company;
- an evaluation of the business partners with respect to CSR (through reference to international norms such as ISO26000 or SA8000+ISO14001 or through compliance with international auditing standards such as SEDEX/SMETA, BSCI)

The process also enables the Companies to optimise their business partner audit process by defining and prioritising the audit operations.

If, on completion of an audit, a business partner is found not to be in compliance with the Group's ethical principles, a business partner may be given the opportunity to define and implement necessary corrective actions. Alternatively, the Companies may terminate their business relationship with such a business partner and/or exclude that partner from invitations to tender.

MONITORING EFFECTIVENESS

In 2018, the Companies together with the Parent Company conducted 19 audits at business partner premises. Those audits did not reveal any serious compliance breach.

No concerns relating to modern slavery were reported through the whistleblowing line or raised through audits in 2018.

TRAINING

It is important that the Companies' staff are aware of and understand the risks of slavery and human trafficking. Staff must be able to identify signs of slavery and human trafficking and be aware of what action to take if such activities are suspected. The Companies will, therefore, consider training opportunities at appropriate levels within the UK.

FURTHER STEPS

The Companies are aware of the pernicious nature of modern slavery and therefore understand that the steps the Companies take regarding risk associated with modern slavery should not be static. The Companies, together with the Parent Company, will continue to monitor operational practices, review their approach and continue to build on this in the year ahead.

The Company has identified the following as key actions for 2019:

- proceeding with deployment of the new compliance programme within the UK;
- continuing review of strategic business partners.

This statement was approved by the Berendsen UK Limited Board for and on behalf of itself and Companies.

Signed

Mark Franklin Operations Director, UK