ELIS UK

Elis UK Modern Slavery Act Statement for financial year ending 31 December 2019

INTRODUCTION

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and is the statement of Elis UK Limited (formerly Berendsen UK Limited) and its subsidiaries within the UK for the financial year ending 31 December 2019. This statement details the steps taken by Elis 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.

The Elis UK Limited subsidiaries covered by this statement are Berendsen Healthcare Limited, Berendsen Hospitality Limited and Berendsen Workwear Limited (the "**Berendsen operating entities**"). The Berendsen operating entities and Elis UK Limited are together referred to as the "**Companies**". On 1 January 2020 the businesses of the Berendsen operating entities, including all assets and liabilities, were amalgamated into Elis UK Limited.

Elis UK Limited is part of the Elis group (the "**Group**") owned by Elis SA, a company incorporated under French law (the "**Parent Company**") and operates 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, and which was implemented throughout the Companies in 2019.

The entire Group is fully aware of, and committed to, its legal and moral obligations to prevent forced, bonded or compulsory labour and human trafficking. Elis UK Limited (together with the Group) is committed to improving its practices wherever possible regarding the fight against modern slavery and human trafficking.

ELIS UK BUSINESS

Elis UK Limited delivers a complete textile rental and laundry service to customers engaged in extensive activities. Its offering ranges from clothing to chef ware, cloths, entrance mats, mops to bed and bath linen and hygiene equipment for public toilets. The customers served by Elis UK Limited through its network of laundries and production facilities, are varied and broadly carry out their activities in the following sectors:

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

Elis UK Limited currently has over 5,000 employees within the UK (operating 32 facilities).

As a whole, the Group employs approximately 50,000 employees in 28 countries and 430 operating facilities and posted consolidated revenues of 3,281.8 million euros in 2019.

SUPPLY CHAIN

The supply of goods, services and products is managed by the UK procurement and supply chain teams, with support and assistance from the Group's procurement function. The Group's procurement function leads on corporate social responsibility ("**CSR**") to assist local departments with selecting business partners.

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

The Group continues to work to rationalise its panel of business partners. This rationalisation should facilitate the implementation of the Group's ethics values, including the fight against modern slavery and human trafficking.

ASSESSMENT OF MODERN SLAVERY RISK WITHIN OUR BUSINESS

Elis UK Limited believes the main risks regarding modern slavery relate to its suppliers in higher risk jurisdictions.

A significant part of the Elis UK Limited supply requirement is procured through the UK supply chain department. Not only does concentrating the procurement of goods and services within a centralised team result in better oversight of the Companies' supply chains, it also ensures procurement activities are carried out by a team trained and skilled in relation to ethical and responsible purchasing.

Elis UK Limited, with the help of the Group's procurement function, ranks, assesses and manages its risks in relation to ethics by focusing on the higher risk countries from which it sources products and textiles. Efforts, therefore, continue to be concentrated on supply from the Indian subcontinent and Asia.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Elis UK Limited has a zero-tolerance policy towards any breach of human rights, including modern slavery and human trafficking.

It is 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 Elis UK Limited's website (<u>https://uk.elis.com/)</u>, sets out expectations of all business partners (such as suppliers) in relation to ethics, including in respect of human rights.

Business partners are required to commit to compliance with the terms of the Charter and, therefore, limit their environmental impact, work towards sustainable development and act ethically. Specifically, the Charter requires business partners to:

- recognise and respect the protection of internationally proclaimed human rights;
- comply 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;
- strictly prohibit the use of child labour or any form of slavery, forced labour and human trafficking;
- 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, Elis UK Limited encourages 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. This is reinforced by the availability of an independent whistleblowing tool for employees to use if they are not comfortable raising concerns internaly.

DUE DILIGENCE AND MANAGEMENT OF MODERN SLAVERY RISK

Elis UK Limited supports the implementation of the Group policy with their business partners, mainly suppliers, by carrying out audits, either through the Parent Company or with the help of an independent audit company. These audits are intended to check that business partners are properly are applying the Group's ethics principles.

In addition, internal processes are complemented by QIMA, an external expert assurance provider which provides screening and ongoing audit of compliance. It reports compliance levels and alerts Elis UK Limited to any areas requiring improvement.

In order to improve audit efficiency, the Companies have been implementing the same audit methodology used by the Parent Company. The main elements of the methodology are:

- 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 methodology facilitates optimisation of the partner audit process by defining and prioritising the audit operations.

If, on completion of an audit, a business partner is found to be non-compliant with the Group's ethical principles, it may be given the opportunity to define and implement

necessary corrective actions. Alternatively, depending on the severity, the relevant business relationship may be terminated, and/or the relevant partner may be excluded from invitations to tender.

MONITORING EFFECTIVENESS

In 2019, the Companies together with the Parent Company conducted 16 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 2019.

TRAINING

It is important that Elis UK Limited 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.

Elis UK Limited has developed an online training module, which was launched towards the end of 2019 following the rollout of the Group Code of Ethics. This training has been designed to support Elis UK Limited's ethical compliance across the business. All employees involved in management, purchasing or customer service are required to undertake the training.

FURTHER STEPS

Elis UK Limited is aware of the pernicious nature of modern slavery and therefore understands that the risk associated with modern slavery must be monitored and managed on a continual basis. Elis UK Limited, together with the Parent Company, will continue to monitor operational practices, review its approach and consider what steps it might reasonably take in the year ahead.

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

Signed

Mark Franklin Operations Director, UK