

# Supplier guidance

## Modern Slavery Act 2015

May 2016



### What is modern slavery

Slavery is a violation of a person's human rights. It can take the form of human trafficking, forced labour, bonded labour, forced or servile marriage, descent-based slavery and domestic slavery. A person is considered to be in modern slavery if they are:

- forced to work through mental or physical threat
- owned or controlled by an "employer", usually through mental or physical abuse
- dehumanised, treated as a commodity or sold or bought as "property"
- physically constrained or has restrictions placed on their freedom of movement

### The use of slavery in the production of goods and services

Typically the products bought nowadays have passed through a long chain of producers, manufacturers, distributors and retailers who have all participated in its production, delivery and sale. It can therefore be very difficult to certify that a product has or has not been produced using slavery. However, the way in which companies operate and manage their supply chain can affect the likelihood of slavery being a part of the final product. The Modern Slavery Act gives responsibility to companies for ensuring that no slavery has occurred, and this applies not only to the products they sell or the services they provide themselves but also to their suppliers, and the suppliers of their suppliers, all the way down the supply chain.

### The Modern Slavery Act 2015 - what companies are required to do

Under the Act, any company with a turnover of more than £36m must produce a statement for each financial year listing the steps it is taking to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business. This statement must be published on company websites and visible to staff, suppliers, customers and investors. The trickle-down effect of the Act will be felt this year as businesses begin to ask more searching questions of their suppliers to seek assurance that they are also taking steps to ensure that their supply chains are free from slavery.

The Chartered Institute of Purchasing and Supply (CIPS) has released some guidance to help small businesses comply voluntarily with the Act; however they suggest that ALL companies:

- ensure all UK workers receive minimum wage and robust immigration checks
- map supply chains to identify where there is highest risk and exposure to modern slavery
- undertake site inspections
- provide training to employees and local suppliers on modern slavery risks and compliance
- review supplier contracts to include obligations to comply with the Modern Slavery Act 2015
- publish a statement outlining the steps you are taking to tackle modern slavery

## What Mitie is doing with its supply chain

Our zero tolerance for modern slavery and our respect for human rights, including children's rights, are built into all our processes and business practices.

As part of the due diligence checks we carry out in our on-boarding process we ask all our suppliers to agree to our Code of Conduct. Please ensure that you have read the document fully at [www.mitie.com/suppliers](http://www.mitie.com/suppliers), and understand the ways in which you can contact us confidentially if you have any concerns.

We will work with our supply chain partners to ensure that modern slavery is not present in the supply chain, and we want all our suppliers to think about the steps they can take to provide us with the assurance that:

- modern slavery is not present in their company
- safe and fair working conditions are provided
- the risks within their own supply chain are understood
- zero tolerance, responsible management and compliance with all legal requirements is reflected in your policies, procedures, practices and in contracts with your suppliers.

We will be contacting suppliers to carry out audits as part of our supplier management, focusing closely on those we consider to be at greatest risk, including those:

- who operate by employing casual or temporary labour
- operate outside of the UK / EU
- manufacture or trade in raw material outside the UK/EU
- with whom Mitie has a strategic exposure

## Further information

We have provided below a list of useful links to resources, guides and information that Mitie strongly encourages all of its suppliers to refer to in order to ensure they are fully informed about the Modern Slavery Act 2015.

UK Government

<https://www.gov.uk/government/publications/stopping-modern-slavery-in-business-video>

<https://www.gov.uk/government/publications/modern-slavery-industry-factsheets>

<https://www.gov.uk/government/publications/support-for-victims-of-human-trafficking>

<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

Chartered Institute of Purchasing and Supply (CIPS)

<http://www.cips.org/en/Supply-Management/Analysis/2016/February/Think-your-supply-chain-is-free-of-slavery-Think-again/>

<http://www.cips.org/en-GB/Supply-Management/News/2015/October/Guide-to-compliance-with-Modern-Slavery-Act-published-by-UK-government/>

<http://www.cips.org/Documents/Knowledge/Procurement-Topics-and-Skills/4-Sustainability-CSR-Ethics/Sustainable-and-Ethical-Procurement/Modern-Day-Slavery.pdf>

Other organisations

<https://modernslavery.co.uk/>

[http://www.antislavery.org/english/slavery\\_today/default.aspx](http://www.antislavery.org/english/slavery_today/default.aspx)

<http://www.unseenuk.org/>