



**Ground Control Limited**

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## Modern Slavery and Human Trafficking Annual Statement 2021

### Introduction

We know that slavery, servitude, forced, bonded and compulsory labour and human trafficking “Modern Slavery” affects both adults and children across the globe and is a growing issue with globalisation and increased migration. It remains a hidden abuse and no industry sector, no matter how small or specialist is immune to Modern Slavery. Ground Control has a zero-tolerance stance to Modern Slavery and Human Trafficking within our own business and that of our third parties, including and not limited to our suppliers.

Our policies confirm our ‘zero tolerance’ approach and we are committed to acting ethically and with integrity and to maintaining systems and controls which are designed to prevent modern slavery and human trafficking from taking place in our business or across our supply-chain. Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply-chain to report suspected breaches of these policies We are committed to ensuring a working environment where people’s fundamental rights and freedom is respected and embraced.

This is Ground Control’s fifth statement made under the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending 31st March 2021. This statement highlights the key activities we have undertaken during the year and aims to provide useful information to understand our commitment to making a positive difference in reducing modern slavery risks that could be connected to our business.

### Our business and supply chain

Established in 1973, Ground Control is a “can do” entrepreneurial business founded on the core principles of quality and delivering an outstanding service to our customers.

With revenues of circa £125m across the group, we provide comprehensive, multi-disciplined and integrated services to support our customers with all their external property needs.

With over 500 customers across 1000’s of sites, we work to deliver excellence for all of our customers. Our supply chain is predominantly national, and our procurement activity is predominantly centralised, with the department primarily sourcing materials and equipment principally related to the provision of services to our customers. We also have a network of field teams who work on our behalf delivering work across the UK.

### Our policies and contractual controls relating to Modern Slavery and Human Trafficking

Ground Control internal policies include our equality, diversity and dignity at work policy, our honesty and ethical behaviour policy, and supplier Code of Conduct. These policies interlink and clearly state that we will not tolerate or condone any abuse of people’s human rights within any part of our business, including and



limited to modern slavery and human trafficking. Suppliers found to be in breach of the supplier code of conduct will be terminated.

We also have a robust whistleblowing policy that has been extended to explicitly state modern slavery and human trafficking; this is available to all our employees and accessible on our Company intranet. Any report will be referred immediately to Human Resources, be fully investigated with appropriate corrective action taken.

### **Our due diligence processes, assessment of the risks and steps we have taken to prevent Modern Slavery and Human Trafficking in our business and supply chain**

An annual risk assessment was completed in February 2020 and we identified that the risk of modern slavery and human trafficking within our business remains extremely low, with over 95% of our employees being British nationals and our suppliers being predominately local or national. We have included modern slavery and human trafficking in our standard contract terms used for new contracts with preferred suppliers.

Our approach to diligence in our supply relationships continued in the previous year, including;

- enquiries in our supplier onboarding to validate that new supplier are meeting both legal obligations in relation to modern slavery and human trafficking and the high ethical standards we require of our suppliers;
- contractual obligations to ensure ongoing compliance with the Modern Slavery Act 2015 and our related ethical policies and procedures; and
- regular review of suppliers through auditing and supplier meetings.

The prevention of modern slavery and human trafficking are given due attention during the due diligence process applied to our new suppliers and a key consideration with our ongoing evaluation of our existing suppliers. We have built long standing relationships with many of our suppliers and have communicated clearly our expectations of business behaviour through our annual calendar of communication activities. In addition to this, our Field Teams are audited on a cyclical basis by our Operational Leaders, with completion KPI's in place.

Our employees' dignity, fair treatment, health, safety and wellbeing are of the utmost importance; during the annual review process employees' contribution to our culture and demonstration of our values "We act with integrity and honour our commitments" and "We value each other" is assessed, recognised and enhancement plans determined.

Robust Right to Work checks are completed with all potential new employees, prior to commencement and supported with an annual program of Right to Work audits, completed with any persons that represent Ground Control including and not limited to all employees. Recognising that our employees need to have the opportunity to report any concerns which they may have regarding any aspect of their working life or work practices, at any time, we have invested into providing all employees with access to a confidential 24-hour support and advice line.

### **Modern Slavery and Human Trafficking training**

Ground Control is dedicated to ensuring that all employees are educated, understand and take seriously their personal responsibility for zero tolerance of modern slavery and human trafficking. We have in place Modern Slavery and Human Trafficking Training for all our Employees and Field Teams through GC Learning, our e-learning platform.

### **Our effectiveness in preventing Modern Slavery and Human Trafficking**

We understand that Modern Slavery and Human Trafficking risks will not remain static and we will continue to complete an annual audit of and mitigate any risk that may be identified. In order for Ground Control to assess the effectiveness of measures taken, key performance indicators have been set and will be reported on in any future Modern Slavery and Human Trafficking Annual Statement.

**Key Performance Indicators**

- Employee training completion
- Supply chain verification and auditing
- Reports of Modern Slavery and Human Trafficking breaches, investigations undertaken, and remedial actions taken.

This statement was approved by the Board of Ground Control Limited and has been published on our website.

Signed

A handwritten signature in black ink, appearing to read 'J. Knights', written in a cursive style.

**Jason Knights**  
**Managing Director**  
**Ground Control Limited**  
**01/06/2021**

This statement has been published in accordance with the Modern Slavery Act 2015. It explains steps that Ground Control Limited has taken during the year, to prevent modern slavery and human trafficking in its business and supply chain.