

Modern Slavery and Human Trafficking Statement

This statement applies to Platinum Facilities and Maintenance Services Ltd (referred to in this statement as 'Platinum'). The information included in the statement refers to the financial year October 2024 to September 2025.

Platinum is a facilities management provider operating within technical services industry within the UK, across a number of clients site mainly in London and the home counties. Platinum is a privately owned business, controlled by a board of directors.

Platinum acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The information in this statement details our policies and processes that ensure modern slavery and human trafficking are not taking place in Platinum internal practices in relation to its labour force and, additionally, its supply chains.

About Platinum – our purpose and our principles

Platinum is technology and energy led hard FM services provider. Our strategic approach to looking after our clients' assets allows them to mitigate risk and deliver significant financial and performance improvements to their organisation. Our values statement cultivates a customer and people centric business through our Platinum R E A C H model. Our Purpose is to provide Data Led Maintenance, for a Responsibly Led Future.

With this in mind, the nature of our supply chain, characterised by technical contractors and trades, leads Platinum to believe that if there was any risk of modern slavery or human trafficking this would occur in our suppliers' early supply chains of materials/equipment. However, we mitigate any risk of slavery and human trafficking taking place either within the company or our supply chains, and at present there is no significant risk.

Responsibility

The Human Resources, Internal Audit, Supply Chain and Procurement teams, plus Platinum's executive leadership team and other line managers, have a particular responsibility for ensuring the company-wide, employees meet these standards set out in the statement.

Responsibility for our anti-slavery initiatives including our policies in relation to modern slavery and human trafficking, due diligence and training of employees is also led by the Human Resources department and accountability for compliance with this statement rests with the Board.

Policies in relation to modern slavery and human trafficking

Platinum requires all employees to comply with 'The Culture Code', which sets out expectations of ethical behaviour for our employees, makes clear our commitment to human rights, freedom of speech and wellbeing. Formal policies and procedures that relate in more detail to Modern Slavery and Human Trafficking are also signposted here.

Platinum has the following policies which further define its stance on modern slavery:

- Modern Slavery Policy
- Human Rights Policy Statement
- Child Labour and Young Worker Policy
- Social Value Partnership Code of Conduct
- Corporate Social Responsibility Policy
- Recruitment Policy
- Employee Code of Conduct
- Sustainable Procurement Charter
- Business Ethics Policy

In addition, our widely available whistleblowing procedure allows any employee or third party to confidentially raise a concern.

Due diligence processes in relation to modern slavery and human trafficking

Platinum endorses the UN Guiding Principles on Business and Human Rights and will work with our employees to raise awareness about Platinum's responsibility to protect Human Rights (See Human Rights Policy).

- All Platinum supply chains are responsible for adhering to our Supplier Code of Conduct. This flows down our expectations around modern slavery and human trafficking ensuring the same standards conform with our principles.

Employees

Platinum does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Platinum in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Platinum strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, and in many cases exceeds those minimums in relation to its employees.

The key areas of our operation that could be affected by slavery and human trafficking are our directly hired employees, agency workers working on our behalf, subcontractor operatives working on our client sites, and the workforce of our supply chain who supply materials to our business. The steps that we take to mitigate risks in relation to each of these areas are as follows:

- We verify that all employees have the right to work in the UK upon commencement of their employment.
- We do not hold or retain any original proof of right to work or proof of identity documentation.
- We ensure that all payments of salaries are made directly to the individual employed only.
- We make all employees aware of their working hours, leave and absence entitlements and other employment benefits by providing them with written confirmation of their terms and conditions of employment.

Training

We prohibit the use of forced labour in our Employee Code of Conduct and through training on modern slavery which is available to employees.

All employees have access to Employee Code of Conduct and 'Culture Code' which contains and signposts details to our stance on Modern Slavery and Human Trafficking such as Whistleblowing Policy, Human Rights Policy and Anti-Bribery Policy.

We require all staff within Platinum Facilities to complete introductory training on modern slavery as part of our induction process. All resources are accessible through our HR landing page on the company intranet to remind staff.

Supply Chain Selection and Assessment

Subcontractors:

Platinum operates with a supply chain of circa 250, where as a minimum, we expect all of our suppliers of equipment, services and materials to comply with our code of conduct and therefore consider the risk of modern slavery and to make a commitment to ensure that there is no slavery or trafficking in their supply chain.

All supply chain members are required to detail how they remain compliant with the 2015 Act, and our preferred suppliers are required to sign up to our Sustainable Procurement Charter, which gives specific commitment to the adherence to the Modern Slavery Act 2015.

Our onboarding process ensures Subcontractors:

- Ensure their employees have the right to work in the UK.
- Consider their approach to employee rights and any breaches of human rights related legislation during our selection process.
- All site operatives to provide evidence of their identification.
- That purchased materials for use on our client sites consider the risk of modern slavery and to make a commitment to ensure that there is no slavery or trafficking in their supply chain.
- That they have taken steps to eradicate Modern Slavery within their business such as they make their own supply chains accountable
- That they ensure they pay their employees national minimum wage, at least, or national living wage (become Real Living Wage Foundation Employers)
- That they provide annual communication confirming compliance with our principles and key measures identified in this policy

Agency workers:

- We will only engage agency workers that are provided by reputable employment agencies on our Preferred Supplier List.
- We require all Preferred Recruitment Suppliers to
 - a) ensure their agency workers have the right to work in the UK
 - b) ensure that no supplier holds or retains any original proof of right to work or proof of identity documentation.

- c) confirm that they do not charge workers a fee for providing them with work and
- d) to demonstrate that they have procedures in place to minimise the risk of recruiting forced or compulsory labour.

This statement will be reviewed and updated as necessary on at least an annual basis. We have during our financial year 2022-2023 become an accredited Living Wage Employer and have reviewed our measures which will be further enhanced to take into account anticipated future UK legislative changes, when implemented.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Glen Cardinal – CEO

1st October 2024