



Modern Slavery & Human Trafficking Policy

HRP-01

Document and Distribution Control

The Human Resources Director overall responsibility for the implementation of this policy. All versions will be controlled by the Governance and Corporate Social Responsibility Division. All hard copies must be treated as uncontrolled.

The Governance and Corporate Social Responsibility Division should be notified of any change of circumstances, comments or queries that may warrant a change to this Anti-Slavery Policy.

Original Issue Date	October 2017
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References	Section 54 (1) of the Modern Slavery Act 2015 Criminal Law (Human Trafficking) Act 2008
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Prepared by	Human Resources Officer
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Approved by	Human Resources Director
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1.0 Purpose

Modern Slavery is a criminal offence under the Modern Slavery Act 2015 UK and Criminal Law (Human Trafficking) Act 2008 Ireland. Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. The purpose of this policy is to establish clear guidelines to identify and reduce the risk of Modern Slavery occurring within our supply chain or business operations.

2.0 Scope

This policy will be applied to all Momentum Support stakeholders including Employees, Customers, Suppliers and any sub-contractor acting on behalf of Momentum Support.

3.0 Definitions

Slavery	The state or condition of being a slave; a civil relationship whereby one person has absolute power over another and controls his life, liberty, and fortune.
Human Trafficking	Article 3, paragraph (a) of the Protocol to Prevent, Suppress and Punish Trafficking in Persons defines Trafficking in Persons as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.
Due Diligence	The degree of care that is to be reasonably expected or that is legally required.
Supply Chain	A channel of distribution beginning with the supplier of materials or components, extending through a manufacturing process to the distributor and retailer, and ultimately to the consumer.

Sub-Contractor	A subcontractor is a person or firm that has a contract to do part of a job which another firm is responsible for.
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4.0 Appendices

Appendix 1	Modern Slavery and Human Trafficking Due Diligence Questionnaire
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5.0 Policy Statement

Momentum Support has a zero-tolerance approach to modern slavery and is committed to preventing acts of slavery and human trafficking from occurring throughout the company and supply chain.

5.1 Company Structure

The company has approximately 2500 + employees and 240 + suppliers across Ireland and the UK. The key services provided by Momentum Support are as follows:

- Cleaning Solutions
 - Industrial Cleaning
 - Commercial Cleaning
 - Education Cleaning
 - Healthcare Cleaning
 - Manufacturing Cleaning
 - Office Cleaning
 - Retail Cleaning
 - Pharmaceutical Cleaning
- Security Solutions
 - Reception/Concierge
 - Static Guarding
 - Mobile Patrols
 - Key Holding
 - CCTV Monitoring

5.2 Due Diligence Process

Risks of modern slavery are dynamic and change quickly. Therefore, we regularly assess and respond to the potential and actual risks in our business and supply chains. To do this effectively, we have put in place a robust due diligence processes;

Suppliers & Sub-Contractors

- Identify, monitor and assess those areas of our business and supply chain most at risk from Modern Slavery and implement initiatives to enhance risk management effectiveness.
- Engage with our Supply Chain at the outset of our relationship to convey the importance of this policy as any non-compliance found may result in termination of contract.
- As part of our Supplier on boarding process they must complete a Modern Slavery Act Due-Diligence Questionnaire (Appendix 1). This questionnaire will highlight whether or not the supplier is committed to ensuring a zero tolerance approach.

Employees

- Momentum Support will ensure the recruitment policy is compliant with the Modern Slavery & Human Trafficking legislation. The Human Resource Department will be responsible for screening & vetting of new hirers. They will also be responsible for monitoring and auditing right to work visas.
- All new employees will receive training in relation to Modern Slavery and Human Trafficking as part of their induction training with the company.
- Employees will receive a copy of the Employee Handbook which will include our Modern Slavery and Human Trafficking Statement.
- Internal training courses and employee tool box talks will be provided to all employees in order to raise awareness of Modern Slavery and Human Trafficking. These training courses and employee toolbox talks will aim to fully educate and prepare managers, supervisors and human resource officers to identify the signs of Modern Slavery and Human Trafficking and how to handle an incident should one occur.

5.3 Whistleblowing Policy

Momentum Support encourages all employees, clients and suppliers to report any activity they feel is unlawful conduct or have concerns about the risk of Modern Slavery. Please see our Whistleblowing Policy for further details regarding the process for reporting suspect activity.

5.4 Policy Violation

An employee who is found to have breached this policy may face disciplinary procedures, which may result on a sanction being imposed, up to and including dismissal. A supplier who is found to have breached this policy may result in the termination of the supplier contract. Momentum Support may also take action to recover any losses sustained, which may include the issuing of civil and/or criminal proceedings against the employee/supplier and/or other individual concerned.

6.0 Review & Amendments to Policy

Momentum Support will review this policy on an annual basis, it may be revoked, replaced or changed at any time to adhere with legislative amendments. Any amendments to this document will be tracked in the table below. All changes must be approved by the HR Director.

Date	Amend No.	New Version No.	Authorised By