

# MODERN SLAVERY

## STATEMENT 2022

*BUILDING  
TRUST*



# INTRODUCTION



This statement, pertaining to Cambridge Maintenance Services Ltd for the calendar year 2022, sets out what we are doing to assess and mitigate the risk of slavery and human trafficking in our business and our supply chain, this will be reviewed annually to assess our progress made since our last statement. This statement applies to Cambridge Maintenance Services Ltd (CMSL). CMSL is part of the Mecsia Group, our Head Office is based in St Ives Cambs and we are involved in mechanical and electrical building maintenance services delivered through our in-house engineering colleagues and a select approved sub contractor network.

In preparing this statement and considering our plans, there are 2 key factors currently that have potential impacts within our supply chains that could give rise to an increased risk of unfair treatment and low paid workers are COVID-19 and the conflict in the Ukraine hence, extra vigilance is needed to help stamp out slavery.

CMSL operates in the UK employs over 170 people and operates in England, Northern Ireland, Scotland and Wales and we have collaborated with our group of companies, in the Mecsia Group, in developing our approach to stamp out slavery.

We are committed to being a sustainable business and ultimately want to have a net positive impact on climate, resources and people. Our values underpin what we do and help to create a culture including respecting each other, supporting our business, pride and equality on a range of issues, including modern slavery.

CMSL is committed to collaborating with its stakeholders to combat slavery and human trafficking throughout our operations and those associated with our business. This is not a standalone issue, but one which forms part of our approach to ensuring that we:

- Treat people with fairness, dignity and respect
- Source goods and services responsibly
- Promote and strive for transparency
- Conduct our business with the highest regard to ethical and environmental standards.

We are committed to ensuring that all of our employees and third parties performing services for or on our behalf and/or joint venture parties abide by the highest professional and ethical standards.

# SUPPLY CHAINS



Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

## Subcontractors and service providers

We have a varied supply chain from subcontractors to service and consultancy suppliers, working across different parts of the business spanning a wide range of skill levels. We have a supply chain management system (PQQ) to register, vet and monitor our subcontractors and service providers and procurement managers across the business to manage relationships.

## Materials and goods

We procure materials and goods to service our business operations, but the majority of materials are sourced through our subcontractor supply chain and are specified to meet the needs of our clients and the projects we deliver for them. We consider ethical and sustainability criteria when sourcing materials and goods where it is within our remit to do so, and work with our clients to assist them in selecting sustainable and ethically sourced materials. When we provide design services, or procure materials and goods directly, we specify to industry standards for responsible and sustainably sourced material.

## Hotspots and risks

We will be undertaking a high-level risk assessment of our spend. The aim is to identify the key trades and categories of spend where there is potential for higher risk of modern slavery or issues which may lead to modern slavery, such as low paid labour.

CMSL will undertake the Home Office Modern Slavery Assessment Tool ('MSAT') to assess gaps in our modern slavery programme and support a strategy for future aims. As many of our key partners review MSAT outcomes, this allows us to further align, sharing both values and goals. The MSAT will assist us to focus on specific hotspots and risks of exploitation and the safeguards we can implement to mitigate risk. As a result of the MSAT outcomes, a refreshed action plan will be developed to achieve key objectives, for example, a standalone Modern Slavery Policy that can be used in the engagement and management of supply chain relationships.

We learn from partners, clients and our supply chain about potential risks and will continually evolve our approach to identifying and acting on risks. We also continue to work with our preferred supply network to establish long term and collaborative relationships to mitigate risks. It is our intention to continue working with our peers, our suppliers and regulators to share information and intelligence to improve our and wider industry understanding of where risks of modern slavery lie. We will review and update our risk assessment periodically and report back on findings and actions taken.

# ACTIONS



## What we are doing

We encourage all CMSL employees to be aware of and report any suspected incidents of unfair treatment either within our business or within our supply chain. We are installing a working group with representatives from key areas within all Mecsia companies including (but not limited to) - legal, human resources, commercial, supply chain and sustainability teams, to identify and carry out the appropriate and proportionate measures that should be taken to minimise the risks of modern slavery or human trafficking in our organisation or in our supply chains. Our responsible sourcing and business ethics policies set out our commitments and minimum requirements.

## What we have done

We have commenced on our Modern Slavery gap analysis, risk assessment and improvement plan. Looking forward our work will continue to be focused on:

- Compliance and due diligence
- Education, training and engagement
- Industry engagement

# ACTIONS



## Compliance and due diligence

- Review use of SSIP approval systems and sector specific approval programs (i.e. BAFE Re: Fire) as mandatory requirements for subcontractors. Review our tendering and supply chain partner requirements. Modern slavery and an organisations approach forms part of the selection and award criteria and specific terms and conditions related to modern slavery are in place for new contracts. This will allow us to set standard levels of expectation with supply chain partners linked to the Modern Slavery Assessment Tool and forms a basis for ongoing engagement and collaboration
- Utilising our risk assessment findings, engage with relevant subcontractors on their compliance
- Work collaboratively with clients, supported by our supply chain, to develop new approaches to modern slavery identification and prevention, including working with these parties to support us in our response to modern slavery
- Review and audit identified key partners in our supply chain specifically around modern slavery risks
- Develop new and specific policies on modern slavery to support our statement and to communicate enhanced requirements to our supply chain.

## Education, Training and Engagement

We have identified communication, training and engagement on modern slavery as a priority for CMSL. During 2022 / 2023, we have undertaken to include:

- Modern slavery e-learning as mandatory training for all employees
- Create a Modern Slavery Information hub on our intranet (Sharepoint) to provide a range of resources that all of our employees whether HO, mobile, remote or mobile engineers and other locations can use, such as posters, toolbox talks and workshop materials
- Undertake a modern slavery awareness promotion as part of supply chain annual reviews, supply chain events and through direct email communications

## Industry Engagement

Investigate a collaboration(s) to collectively improve industry performance on sustainability issues, including modern slavery.

Complete the Home Office Modern Slavery Assessment Tool annually to review / evaluate our actions and plans and continued statements going forward.

Detailed above are our plans for 2022 / 2023, these will be reviewed and next statement updated by end of June 2023.

**Signed:**

**Mr. I. Wheeler - Managing Director**



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