

COMMERCIAL SERVICES GROUP MODERN SLAVERY STATEMENT

FOR YEAR-ENDING MARCH 2025

This Statement is made on behalf of Global Commercial Services Group Limited ('CSG', 'the Group'), all its subsidiary entities, joint ventures and trading brands and all activities for which CSG has responsibility for delivery across all sites occupied by the Group and its joint venture organisations, pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025.

CSG is committed to ensuring that it implements steps within its major procurement processes and subsequent supply chain partners and sub-contractors to endeavour to eliminate and eradicate acts of modern slavery and human trafficking. The Group takes a zero-tolerance policy in respect of modern slavery and human trafficking.

Section 1: About CSG

Organisation Structure

CSG is a supplier and broker of products and services in the UK and across the world. It is pre-eminent in the supply of goods and services to the public sector as well as private sector customers and to international schools all around the world.

Commercial Services Group is a trading style of Global Commercial Services Group Ltd (Reg No 1173561) and all its subsidiary entities, joint ventures and trading brands.

Its operating company Global CSG Ltd is wholly owned by Kent County Council.

Goods and services bought by CSG

There are a range of goods, services, and works which are bought across the group and broadly fall into the following category headings below:

Goods/services for resale

We deliver an extensive range of products and services to Nurseries and Schools across the World via our Global Education Supplies division.

In addition to the above, we also have an Energy division which produces and sells energy and energy related products to the wider public sector.

Due to the global nature of the business, our supply chain in this area is also global via our strong partnerships with world-leading suppliers. These products are ethically sourced and compliant with safety standards.

Provision of Frameworks for use by the wider public sector

Examples of the types of Frameworks provided are listed below

- Energy
- Recruitment
- Banking & Finance
- Construction
- Education
- Emergency Services
- Facilities
- Fleet
- Health & Social Care
- Highways
- Office
- People & Professional Services
- Property Management
- Technology

Technology purchases

These purchases cover everything from ICT consumables through the ICT network solutions.

Recruitment Services Joint Venture

These manage Dynamic Purchasing Systems to recruit Specialist Interim & Executive and Social Care staffing across the public sector providing compliance driven by public sector heritage

Community Services

This specialises in the planning, development and management of grounds maintenance and therefore buy a range of requirements such as hard and soft landscaping, planting trees and playground inspections. CS actively invest in a fully vetted and compliant supply chain.

Section2: Modern Slavery Policies

Implementation of the Modern Slavery Procurement Policy Note (PPN) 009 CSG has fully implemented PPN 009 within its procurement processes and documents. Examples of the processes implemented include:

The Procurement process flow that is available to all members of the group contains documents and templates that are made available at the appropriate point in the commercial lifecycle.

These documents include

- Modern Slavery Assessment Tool (MSAT) risk tool
- Contract tier descriptions to support the MSAT
- Example contract clauses for use in our contracts
- Access to the supplier's assessment portal

- Example evaluation questions, contract management and KPIs
- Supplier audits points to consider
- Remedial Action Plan template

Policies in relation to slavery and human trafficking

- Our Procurement Policy includes statements on modern slavery and ethical procurement practices plus requirements expected of Supply Chain and Contract Managers in contract management activities.
- The Procurement Policy reiterates that any breach by the supplier in regard to their modern slavery obligation shall be deemed a material breach of our agreement and shall entitle the Authority to terminate the agreement with immediate effect. It also advises the procedure for reporting any suspicions or concerns.
- Additionally, our Whistleblowing Policy allows employees to report any concerns confidentially.

These example questions where relevant, are evaluated in our tender process:

- Evidence of compliance with all applicable labour/employment laws in delivering the contract.
- Provision of training on modern slavery for employees and personnel with responsibility for supply chain management in respect of the workers and supply chain that will deliver the contract.
- Identify sourcing geographies where suppliers will deliver services or manufacture goods for the contract where there is a high risk of modern slavery.
- Number of workers employed and on what basis (e.g. direct, agency staff etc.) to deliver the contract.
- Workers who will deliver the contract are aware of their rights and have employment contracts in place.
- Evidence that no worker who will deliver the contract has had to pay for employment.
- Evidence that passports of the workers' who will deliver the contract are not retained.
- Evidence that workers who will deliver the contract are free to join a trade union/collective agreement.
- If an effective whistleblowing/grievance mechanism is in place for workers and supply chain workers who will deliver the contract.
- How recruitment policy prohibits the practice of worker-paid recruitment fees, e.g. adoption of the Employer Pays Principle, a policy of no worker-paid recruitment fees in relation to any worker who will deliver the contract.

Examples of good practice in CSG

Policies and Procedures

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Employee code of conduct:** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Internal communications

These resources have been made available to staff on the Corporate Procurement Intranet site

- Quick reference guide: tackling modern slavery
- Modern slavery guidance

Section 3: Risk Assessment and Action Plans

The Group's suppliers have supply chains that are global, providing direct and indirect support to the delivery of requirements.

Due to the complexity of global supply chains, the Group does not have full transparency of its full supply chain, and a risk-based approach has been taken to achieving greater supply chain visibility of potential modern slavery risks focusing on higher risk supply chain contracts.

Risk Management Framework (RMF)

The Group's RMF underpins our procurement policies, ensuring modern slavery risks are identified, assessed and appropriately mitigated.

Modern slavery is captured under the following strategic risk themes

- Compliance with legal/regulatory requirements
- Supply chain
- ESG / social & sustainable value

An action plan to manage any risks identified across the commercial life cycle is developed and used throughout the procurement process.

Supply chain responsible recruitment practices

The Group ensures that both its own recruitment practices are robust, and, when awarding contracts, the supply chain are also implementing robust recruitment practices.

Suppliers are required to submit their modern slavery statement/policy which we ensure is current to their application. The contractual terms state that they are required to inform CSG immediately if they suspect or become aware of any breaches in their supply chain. Failure to inform of what becomes a proven breach will result in removal from the CSG supply chain.

Due diligence processes

We endeavour to ensure that modern slavery is not evident in any aspect of our business dealings by ensuring that our teams have access to guidance, templates and tools to support them in this endeavour.

To aid our professional teams to employ tools that will help to identify the Modern Slavery risk, we have created a visual process flow using the Cabinet Office Procurement Pathways approach.

To complement this model, we have utilised tools such as the Modern Slavery Assessment Tool (MSAT) to identify modern slavery risks on our procurement opportunities. The MSAT has been woven into the procurement process so that professionals can follow steps and utilise these tools at the right time in the commercial lifecycle.

Where risks of modern slavery are highlighted, the teams are able to employ model modern slavery evaluation questions in the tenders and request suppliers complete the Modern Slavery Assessment and share the results as part of their tender submission. Any supplier that fails to submit the required data and/or fails to evidence compliance is allocated a fail rating and is subsequently excluded from supply.

In addition to the assessments, we require all suppliers to demonstrate their commitment to eliminating modern slavery, through recruitment policies and procedures. This involves suppliers evidencing how they select sub-contractors and that the commitment to eliminate modern slavery also flows down through their supply chains.

Our contract terms contain the model modern slavery clauses that specify the supplier's contractual obligation as well as the ongoing key performance indicators that are monitored by our contract managers.

Supplier Management

We employ Supply Chain and Contract Managers who have responsibility for a defined range of suppliers or categories. Our Supply Chain and Contract Managers undertake regular reviews, part of which is to request evidence that they are ensuring their commitment to eliminating modern slavery in their supply chains. This includes requesting the most up to date assessment, statements and/or reporting any instances of concern, enabling Contract Managers to monitor progress against the original assessment report.

Where improvements are required, the Contract Managers have access to a Remedial Action Plan template to support them in managing the supply chain.

Contract Managers are also provided with guidance on what to consider when undertaking supplier audits. The aim here is to ensure that our contract managers have the correct guidance to support them in their management activities.

As with the other guidance and templates, these have been woven into our procurement process flow which is available to teams via the corporate procurement Intranet site.

The procurement process flow provides guidance to contract managers that supports the challenge to all potential and existing suppliers on their payment of sub-contractors, encouraging all to make payments within 30 days. These are typically checked for compliance at the framework evaluation stage. This is subsequently picked up by Framework Managers via the Supply Chain Payment document which is tracked using the contractor KPIs.

Incident Reporting

We encourage both suppliers and our staff to report any incidents or suspicions of modern slavery. In the year ending 31st March 2025, there have been no instances or suspicions relating to modern slavery reported.

Section 4: Training and Awareness Raising

Staff training

The Corporate Procurement Team holds internal awareness sessions for teams to attend and makes guidance available via our Procurement Intranet site. Staff are made aware of ethics training available from CIPS as well as the e-learning modules available via the Government Commercial College website.

The Corporate Procurement Team have set up a quality assurance framework to ensure that Modern slavery is considered for appropriate contracts. The checks look at how the tools that are available are implemented to mitigate the risks of modern slavery in our supply chains. Where improvements are identified, these are shared with the team responsible to action.

Section 5: Goals and Next Steps

To strengthen how the Group tackles modern slavery and align our commitments, we will undertake the following actions for 2025/26:

Goal 1

- Raise the awareness of the MSAT risk identifier to the Group
- Review and assure a sample of contracts let in the previous 12 months for modern slavery risk confirmation
- Implement contract tiering to support a risk-based approach

Goal 2

- Ensure that contract management assessment of supplier improvement actions is embedded.

Goal 3

- Align supplier onboarding processes across the Group

Goal 4

- Continue to hold modern slavery internal training sessions and signpost teams to CIPS ethic test and to the GCC e-learning course

Goal 5

- Ongoing assurance of modern slavery compliance via corporate Procurement

Signatories

Chief Executive Officer: Matt Johnson

Date Approved:

Chief Financial Officer: Rob Boyles

Date Approved: