

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Omni Facilities Management is committed to preventing modern slavery and human trafficking in all its business activities and within its supply chains. We recognize our responsibility to ensure that our business operations and supply chains do not contribute to modern slavery in any form.

Our Business

We are a leading provider of bespoke outsourced Housekeeping services to over 130 hotels across the UK, Netherlands and South Africa. Employing over 4000 people, Omni provides Housekeeping Services to some of the world's most prestigious global hotel brands and has a Head Office in the UK.

Our Commitment

Omni acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

We are committed to continually improving our practices to combat slavery and human trafficking.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.

Omni Facilities Management 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.

We implement stringent procedures in relation to the hiring of employees and temporary staff, as well as where we employ the services of third-party organisations, to alert us of any signs of modern slavery.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in United Kingdom.



Our Policies

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our supply chains include, but are not limited to, sourcing temporary staff for our clients, as well as for our own direct hospitality services. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner by adhering to our Supplier Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.

The above could include steps relating to:

- reviewing our supplier contracts to include termination powers if the supplier is, or is suspected, to be involved in modern slavery;
- measures in place to identify and assess the potential risks in its supply chains;
- undertaking impact assessments of its services upon potential instances of slavery;
- creating action plans to address risk to modern slavery;
- any actions taken to embed a zero-tolerance policy towards modern slavery.

POTENTIAL EXPOSURE

The Company considers its main exposure to the risk of slavery and human trafficking to exist in areas of third-party suppliers because they involve the provision of labour within UK.

In general, the Company considers its exposure to slavery/human trafficking to be relatively limited considering the measures we have in place. Nonetheless, we have taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

The Company carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Company, has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

Below we set out the steps we take to ensure there is no slavery or human trafficking occurring within our organisation or its supply chains.



STEPS TAKEN TO TACKLE MODERN SLAVERY

- Produce a comprehensive Modern Slavery Statement that reflects the actual steps taken and incorporates deliverable actions.
- Have a commitment from senior leadership to tackle modern slavery, with board level responsibility.
- Document what we want to achieve in preventing modern slavery in our business and supply chain.
- Conduct due diligence checks with both new and current contractors and suppliers, backed up by unannounced site visits, worker interviews and detailed document reviews.
- Host regular contractor and supplier meetings, which includes reiteration of the criteria of expected standards.
- Implement Code of Conduct agreements requiring either a signed copy or the completion of a questionnaire according to the content of a Supplier Code of Conduct.
- Embed interconnected systems and data for a closed loop of compliance and stop payments and work instructions if failing short on modern slavery compliance.
- Apply across all suppliers and contractors and ensure they also conduct due diligence with their own suppliers and provide organisations one true view of visibility.
- Training and support for contractors and employees on how to implement policies and identify forced labour to spot the signs that may indicate worker exploitation.
- Train employees in procurement processes to recognise, prevent and report forced labour and other hidden third-party labour exploitation.
- Put in place good robust checks for the company's own employees like our recruitment procedure and policy as well as systems in place (e.g., RecruitGenie)
- ➤ Good workplace monitoring practices and encourage managers to talk informally to employees to understand whether any are experiencing issues.
- > Due diligence processes for slavery and human trafficking

Our supply chain providers are always based in UK, and we expect these entities to have suitable antislavery and human trafficking policies and processes.

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk, the Company has in place systems to encourage the reporting of concerns and the protection of whistleblowers.

TRAINING

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

All employees receive an induction into the business where our policies, procedures and expectations are outlined.



A) TRAINING

The Company provides the following training to staff to effectively implement its stance on modern slavery induction training, training on modern slavery policies etc.

B) POLICIES

The Company has the following policies which further define its stance on modern slavery e.g., a modern slavery policy; a corporate social responsibility policy; supplier code of conduct; Supplier agreements and recruitment policy.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

The Company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits.
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment.

REPORTING SUSPICIONS OF SLAVERY

Employees can report any suspicions of slavery either through the Company's Public Interest Disclosure (Whistleblowing) policy or externally to the Modern Slavery Helpline. Details are set out below:

- https://modernslavery.co.uk/contact.html
- 0800 0121 700

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending March 2024.

Riaz Ladha, Chairman

Omni Facilities Management Limited

Name: Riaz Ladha Signature: R.Ladha

Position: Chairman **Date:** 07 August 2024