

# COMMERCIAL SERVICES GROUP SLAVERY STATEMENT

## FOR YEAR-ENDING MARCH 2024

This Statement is made on behalf of Global Commercial Services Group Limited ('CSG', 'the Group'), all its subsidiary entities and trading brands and all activities for which CSG has responsibility for delivery across all sites occupied by the Group, 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 2024.

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.

Modern Slavery, as described in the Modern Slavery Act 2015 includes a range of potential exploitation types, including but not limited to:

- Slavery, servitude and forced or compulsory labour
- Sexual exploitation
- Removal of organs
- Securing services by force, threats or deception
- Securing services from children and vulnerable persons

### **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 general 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 and trading brands. Its operating company Global CSG Ltd is wholly owned by Kent County Council.

### **Our Approach**

We endeavour to ensure that modern slavery is not evident in any aspect of our business dealings. On large value Contracts or Frameworks, considered to be those exceeding the current value £214,904 incl. VAT (as stated in the Public Contract Regulations 2015), we require all suppliers to demonstrate their commitment to eliminating modern slavery, through recruitment policies and

procedures. In addition, suppliers are asked to evidence how they select sub-contractors and how they endeavour to eliminate Modern Slavery from their supply chains also.

Our invitation to tender or bid documents contain a standard set of questions that relate directly to Modern Slavery. 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 our standard contract terms, there are clauses that specify the supplier's contractual obligation concerning Modern Slavery.

Our Procurement Policy includes statements on Modern Slavery and Ethical Procurement practices plus requirements expected of Supply Chain and Contract Managers in contracting management activities.

We challenge all potential and existing suppliers on their payment of sub-contractors, encouraging all to make payments with 30 days. Those that have extended payment terms in their supply chain are encouraged to reduce these terms to avoid potential building blocks for modern slavery activities.

In all our procurement activities we reserve the right to challenge any bid that is deemed as 'abnormally' low-cost. This gives us the capability to assess if the supplier is using modern slavery as a means of providing the services.

We encourage both suppliers and our staff to report any incidents or suspicions of modern slavery through their respective line management structure and in turn to the Head of Procurement and/or Chief Strategy Officer. Any suspicions reported are followed through immediately. In the year ending 31st March 2024, there have been no instances or suspicions reported.

We reserve the right to remove any supplier that, is found guilty of committing an offense covered by the Modern Slavery Act. To date no supplier has been removed from supply.

### **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 of all major suppliers, 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 statements and/or reporting any instances of concern.

We look to create relationships and partnerships with our key suppliers encouraging openness, transparency and honest communication as well as promote ethical conduct and social responsibility in our dealings.

Our central Procurement function undertake internal Contract Management Audits throughout the year to ensure that contract managers are delivering all relevant activities as stated in the CSG Procurement Policy that include ensuring supplier modern slavery compliance.

**Training**

Our procurement and contract management staff are required to complete training for wider safeguarding and equality issues, including aspects such as Modern Slavery.

We raise awareness amongst all our staff on Modern Slavery and our central Procurement Team offer support and assistance to Supply Chain and Contract Managers to ensure that they are aware of our, and there, obligations.

**Incident Reporting**

As part of our procurement process, we will only engage with suppliers and contractors who confirm their compliance with the Act. We have adapted our existing corporate policies to incorporate modern slavery and human trafficking issues including our Whistleblowing Policy which allows employees to report any concerns confidentially.

Any person or organisation that has suspicions or concerns about Modern Slavery within our supply chain should email [csgprocurement@csltd.org.uk](mailto:csgprocurement@csltd.org.uk)