

## APCOA PARKING (UK) LTD

# Modern Day Slavery & Human Trafficking Statement 2020

APCOA Parking (UK) Ltd (APCOA) treats its obligation and responsibilities under Section 54 of the Modern Slavery Act 2015 as a business priority and recognises its commitment to tackling modern day slavery and human trafficking.

Modern slavery is the exploitation of other people for personal or commercial gain and can take many forms. APCOA conducts its business with a zero-tolerance approach and with effective systems to ensure that any potential risks can be promptly and effectively identified.

The information included in this statement applies to APCOA's financial year ending December 2020; to be reviewed again in December 2021, as required under the provisions of the Modern Slavery Act 2015 (the 'Act').

This statement outlines the steps and responsibilities APCOA takes in compliance with the Act to make sure that there is no slavery or human trafficking occurring within the Organisation and that it is addressed and prevented within its supply chains.



## 1. OUR BUSINESS AND SUPPLY CHAINS

APCOA was established in 1971 as a parking management company and is now the UK's leading provider of tailored parking solutions. APCOA provides car park management services to a wide and varied clientele that includes local authorities, hospitals, and private sector clients, both large and small. As a result, it has limited supply chains for the goods and services it purchases.

Whilst the bulk of APCOA's business is carried out through the operating company of APCOA Parking (UK) Limited, other subsidiaries of the UK holding company (APCOA Parking Holdings (UK) Limited) and are also contractual counterparties, although most of their activities are historical or legacy contracts. They have adopted this statement and will, in respect of their own activities, apply its terms and requirements.

## 2. COMPANY POLICIES

APCOA's Human Resources department holds responsibility for anti-slavery initiatives within the company and has the following policies and procedures in place to support its approach to modern slavery not taking place within the business or within its supply chains.

All our policies are available to all colleagues at any time via APCOA's Intranet site.

In the coming months APCOA will be introducing a Code of Conduct Policy that will apply to all APCOA colleagues. This will be designed to make sure that all colleagues understand what is expected of them with regards to their conduct, and also how they can expect to be treated. We strive for the very highest standard of behaviour from all our colleagues.

- The Colleague Handbook - Our handbook details key areas of our policies and the expected standards of our employees, to ensure that good working practices are promoted and that we do the right things. The handbook summarises and provides direction on our Company Values, Dignity at work and Equality and Health and Safety.
- Business Ethics Policy - We expect the highest standards of business ethics and that our employees comply with applicable laws and regulations. This Business Ethics Policy establishes the level of conduct expected of all colleagues.
- Recruitment and Selection Policy - We endeavour to treat all applicants fairly, objectively and in a consistent manner throughout the recruitment and selection process; and are committed to developing a strong and diverse workforce. The legal considerations of this policy include the regulations of Equality and Equal Opportunities, Data Protection, Asylum and Immigration and Equal Pay.

## 3. DUE DILIGENCE PROCESSES

Within APCOA's operations:

To ensure that there is no slavery or human trafficking within APCOA we protect all employees by making sure that they have:

- A contract of employment which sets out their right and obligations, including the notice period required should they wish to terminate their contract with us.
- Verification of their identity and their right to work in the United Kingdom.

- A right to retain their identity documents and passport. We retain only copies of these during their employment.
- The legal amount of working time and statutory time off; to include any holiday entitlements, sickness and maternity / paternity and time off for personal emergencies.

Within our Supply Chain:

To ensure that there is no slavery or human trafficking in our supply chain APCOA undertakes regular reviews of its suppliers for wider commercial reasons and continues to monitor each of those it selects as partners going forward. APCOA also carries out on due diligence on all new suppliers and renews its due diligence of those suppliers on any renewal of an agreement with an existing supplier. Both of these are designed to ensure that slavery or human trafficking is not taking place within the business or within its supply chains, thereby making sure that APCOA continues to meet the requirements of the Act on an ongoing basis.

APCOA is currently developing a self-certification system of compliance which will be implemented to evidence compliance from and by each of APCOA's suppliers. Responses to this certification request will be reviewed, and risk assessed. APCOA expect to use the results of this to direct further questioning and audits as necessary where higher risk activities have been identified.

In addition to the self-certification system APCOA will be developing a Supplier Code of Conduct during the coming year which seeks to ensure that proactive steps are taken in our suppliers' own operations and supply chains. We will require acceptance of the Code of Conduct by all new and existing suppliers.

#### 4. MANAGING RISK

APCOA's procurement programme is an ongoing operational activity and as part of the renewal of arrangements with its chosen suppliers APCOA has a process for including contractual obligations within the renewal contracts and these are augmented by the review of processes and acceptability of suppliers undertaken as part of that contract renewal process.

In future years these checks and/or audits will be linked with the supplier questionnaire responses to inform the risk assessment of each of our suppliers and further audits or other action will be taken as necessary when risk is identified. This additional action could be with a view to seeking to influence that supplier into making appropriate changes within its supply chain or if that is not successful to seek to bring to an end APCOA's links with that supplier.

#### 5. PERFORMANCE INDICATORS

With the challenges that faced the Car Park Management sector during the pandemic throughout 2020, there has been a drive to seek greater efficiency. This has resulted in APCOA developing and expanding its use of technology and harnessing the talent of its employees to deliver cost effective but resilient systems. We have asked our suppliers to do likewise and have worked with them to achieve this whilst making sure that all of this has been achieved within our legal and ethical framework.

Going forward with the continued challenges from the pandemic and its economic ramifications, the work that we are currently doing (as described earlier in this statement) will allow us to introduce a more matrix centred approach and reporting mechanism.

#### 6. TRAINING AND COMMUNICATIONS

To raise awareness and understanding of the 'Act', colleagues who are involved in the management or procurement of services receive training through an e-learning course that is Continual Professional Development (CPD) certified. This enables the learner to identify and report any signs of any unethical practices they may encounter through the business and supply chain.

In addition, APCOA's Human Resources department works with various key colleagues to identify the skills of those individuals regarding their knowledge of the Modern Slavery Act 2015 and key indicators that a problem may exist with its suppliers. Where necessary or relevant, APCOA will continue to work with those colleagues to enhance their knowledge for the benefit of the entire business.

#### 7. PLANS FOR THE COMING YEAR

In 2021, APCOA aim to continue to raise awareness of this matter so that its employees and suppliers continue to remain aware of and compliant with the 'Act' in accordance with the guidelines and regulations.

Should there be any concerns regarding modern slavery, APCOA's Human Resources department should be notified, who will ensure that the relevant action is undertaken in accordance with APCOA's business obligations.

#### 8. BOARD APPROVAL

APCOA Parking (UK) Ltd.'s Board of Directors has approved this statement for the financial year ending 31st December 2020.



Kim Challis  
Regional Managing Director – UK & Ireland