

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Introduction**

In compliance with the Modern Slavery Act 2015, Lex Leisure CIC and its subsidiaries provides the following statement regarding its efforts to prevent slavery and human trafficking in its business and supply chain. We have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

### **Our Structure, Business & Supply Chains**

Lex Leisure CIC is registered in England and Wales under Company No:**10690651** and specialises in the development and operation of leisure facilities on behalf of Local Authority clients. Since our formation in 2017 we have grown considerably, managing a diverse range of sites throughout the country, with a turnover in excess of £30m and employ approximately 1,400 staff.

The procurement activities carried out by Lex Leisure CIC mainly relate to repairs and maintenance, equipment, cleaning, utilities and catering, with UK and EU sourced labour. We work with a variety of suppliers from large corporations to subcontractors and small local suppliers providing a wide range of products and services. The majority of our suppliers are based in the UK.

### **Policies**

Lex Leisure CIC's commitment to prevent modern slavery is outlined in our Slavery and Human Trafficking Policy and our Purchasing Policy.

### **Due Diligence Processes in relation to slavery and human trafficking**

Lex Leisure will not support or deal with any business knowingly involved in slavery and/or human trafficking. The company has zero tolerance of any act(s) of modern day slavery and human trafficking within its business and its supply chains, including subcontractors and partners. The company acknowledges its responsibility as defined by the Modern Slavery Act 2015 and ensures transparency within the organisation and its suppliers of goods and services.

As part of the company's due diligence processes in connection with its slavery and human trafficking policy, the supplier approval process requires suppliers to comply with the Modern Slavery Act and to submit evidence as to how they take steps to mitigate this issue, where required. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources is continually monitored.

Lex Leisure uses select providers to manage its small amount of agency and temporary worker requirements. The contracts require the provider to ensure compliance by itself and its suppliers with the requirements of the Modern Slavery Act.

### **Identification of the risk of slavery and human trafficking in our business and supply chains, and the steps taken to assess and manage risk**

*Registration Number - 10690651*

*Registered Address -71 Graham Road, Malvern, Worcestershire, WR14 2JS*

In terms of identifying indirect suppliers (for example, suppliers of components which form part of the equipment purchased by Lex Leisure), each direct supplier is required under Lex Leisure's compliance requirements to confirm that their supply sources for any components or labour for their equipment are compliant with the Modern Slavery Act.

In terms of use of direct labour within the UK, Lex Leisure employs on direct contracts of employment, all of which are compliant with UK and EU legislation. Wages are paid electronically directly to employee's bank account and all new employees of Lex Leisure are required to provide the appropriate Right to Work evidence in line with Home Office guidance. Lex Leisure is fully compliant with the legislative requirements of both the National Minimum Wage and the National Living Wage.

With regards to indirect labour, Lex Leisure uses carefully selected providers to manage its small amount of agency and temporary worker requirements. A Service Level Agreement is in place with the suppliers which obliges them to comply with the Modern Slavery Act, amongst other regulations. In addition, we understand that the compliance safeguards within the suppliers payroll systems mean that a worker cannot be supplied to Lex Leisure unless they have provided the correct documentation in relation to their right to work in the UK.

Where Lex Leisure employs subcontractors to carry out work on its behalf, the sub-contract agreement contains obligations to comply with the Modern Slavery Act and other employment legislation.

### **Implementation**

In order to achieve our objective of tackling slavery, forced labour or human trafficking, we will:

- Require all of our suppliers to provide self-certification confirming that they are not aware of any incidents of slavery, forced labour or human trafficking occurring within their business and own supply chain;
- Undertake regular reviews of our supply chain and identify any potential risks. Those suppliers that are identified will be allocated a risk profile based on the information available to us and monitored;
- Where suppliers fall short of our expectations, require a remediation plan be prepared, implemented and reviewed to address any shortcomings highlighted;
- Provide relevant employees with training to recognise any signs of slavery, forced labour or human trafficking within our supply chain and encourage practices to mitigate the risk of this occurring;
- The Company encourages anyone to raise any concerns about modern slavery and will support anyone who acts in good faith. The Company has a whistleblowing policy which can be used to report any instances of modern slavery;

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

### **Effectiveness**

Potential suppliers who fail to confirm that their supply sources for any components or labour for their equipment are compliant with the Modern Slavery Act are not added to the supply chain.

Through monitoring, any suppliers who become non-compliant with the Modern Slavery Act are removed from the supply chain.

We use the following Key Performance Indicators (KPI's) 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 chain:

- Completion of audits by the procurement/commercial senior management team
- Use of labour monitoring and payroll systems and
- Level of communication and personal contact with the next link in the supply chain their understanding of, and compliance with, our expectations.

## **Training**

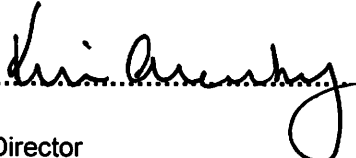
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject

## **Responsibility & Implementation**

The company directors and senior management take responsibility for implementing the Modern Slavery and Human Trafficking Policy and this statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of the Modern Slavery and Human Trafficking Policy is accessible to all employees electronically or can be obtained from the HR department upon request. This policy statement will be reviewed annually and published.

This statement is made pursuant to section 54(1) Modern Slavery Act 2015 and constitutes Lex Leisure's Slavery and Human Trafficking statement for the financial year ended 31 December 2020. It has been approved by its Board of Directors.

Signed.....  14<sup>th</sup> October 2020

**Position** - Director

**Financial Year End:** 31/12/2020

**Dates this statement covers:** 01/11/2020 - 31/10/2021

**Lex Leisure CIC**