

A photograph of a golf course landscape. A light-colored gravel path curves from the foreground towards the right, where three wooden benches are placed. To the left of the path is a well-manicured green lawn. The background is filled with lush green trees and dense foliage, including a prominent white-barked tree in the center. The overall scene is peaceful and scenic.

Modern Slavery and Human Trafficking Statement 2024/25

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Conclusion

Introduction

It is with pleasure that I introduce our Modern Slavery Statement for the Financial Year 2024/25.

This statement outlines the progress we have made over the last 12 months towards eliminating the risk of modern slavery and human trafficking from our business and supply chain, and the actions we plan to take over the coming year.

Over the last year, we have continued to make significant advances in our efforts to combat modern slavery. We remain resolute in our commitment here and have continued to implement a number of key initiatives designed to enhance our approach in this area.

I continue to be proud of the work done by our Modern Slavery Working Group. Their tireless championing in this space has kept the issue at the front of our agenda and I am confident that we are well on the way to meeting our aim of being a pioneer within our industry when it comes to combatting modern slavery.

Ground Control has always been a values driven business and this can be seen to full effect in the launch of our Modern Slavery Strategy. This strategy sets out the roadmap we will follow over the next few years with our people, our partners and our stakeholders. As well as allowing us to effectively monitor and measure our progress it also allows us to focus on continuously reviewing and updating our approach to modern slavery risks in our industry.

As a business we have always been technology-led and our approach to modern slavery encompasses this. Our use of Skillko, Total View and our other systems has been crucial in helping us reduce our exposure to modern slavery risks and enhance our management of our people, Field Teams and suppliers.

Finally, I would like to again, thank Unseen UK, our modern slavery advisors, for their continued support in developing our approach in the modern slavery space. We first began our partnership with them in 2023 and we continue to see the benefits of their support and advice. Their partnership has been vital in ensuring that our efforts are aligned with the latest developments and standards in combating modern slavery and they work with us to set the standard for our industry and beyond.



Jason Knights,
Managing Director



Legislative statement

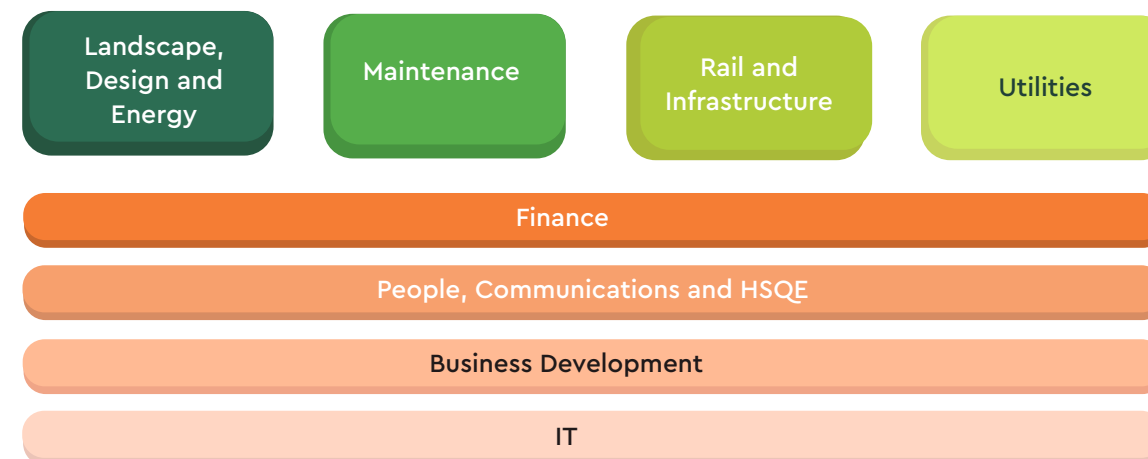
This statement sets out Ground Control's actions to understand all potential modern slavery risks related to our business, and to put in place actions to mitigate the risk of modern slavery and human trafficking within Ground Control Holdings Ltd and all of its entities, including Ground Control Ltd. This is our ninth statement under the Modern Slavery Act 2015 and constitutes our Modern Slavery Statement for the financial year ending 31st March 2025. It details the key activities we have undertaken to demonstrate our commitment to making a positive difference in reducing the modern slavery risks that could be connected to our business.

We know modern slavery and human trafficking is a growing issue in our society and we remain committed to doing all we can to eradicate it. For this reason, we will continue to review our approach and actions to ensure we are doing all we can to minimise the risk of modern slavery occurring within our business or supply chain.

Within Ground Control, we use the Ethical Trading Initiative's (ETI) Base Code as our guide for ethical employment practice. Our work towards exceeding goals in this area is intended to support our efforts in addressing any modern slavery risks within our industry. We also remain compliant with, and expect our suppliers to remain compliant with, the principles set out in the UN Global Compact Initiative, the International Labour Organisation's standards on child labour and minimum age, and the principles of the Modern Slavery Act 2015.

Who we are

Ground Control, established in 1973, is a "can-do" entrepreneurial business founded on the core principles of quality and delivering an outstanding service. With revenues of circa £195m across the group, we provide comprehensive, multi-disciplined and integrated services to support our customers with all their external property needs across our four operational divisions.



Our supply chain is predominantly national (with a growing operation in the Republic of Ireland), and our procurement activity is largely centralised, with the department sourcing materials and equipment principally related to the provision of services to our customers.















We also have a network of Field Teams who work on our behalf delivering work across the UK and the Republic of Ireland.



Our values

Ground Control is a values-driven business. Our values are reflected in our actions, policies and processes, and we expect all our people and partners to be deeply familiar with what our values mean to us. They are the foundation upon which we approach a complex issue and we do so with integrity, commitment and a genuine desire to effect positive change.

By integrating our values within our business we give our people and partners guiding principles and help them to prioritise behaviours that align with integrity, fairness and respect for human rights. They also provide a framework for us as we grow, ensuring our people have a sense of purpose as they seek to navigate changing markets and sectors.

 We deliver outstanding customer service	 We value each other	 We act with integrity and honour our commitments	 We seek value in everything we do	 We innovate and embrace change	 We win as a team	 If it is to be it is up to me
						

Our commitment on modern slavery

At Ground Control, we are steadfastly committed to leading the fight against modern slavery. With responsibility as one of our guiding principles, we pledge to set the standard for ethical practices in our industry. We've been recognised externally for our work on combatting modern slavery and we aim to be recognised as a beacon of excellence within our industry, driving transparency, accountability and innovation throughout our operations and supply chains. We will continue to invest in robust due diligence, engage with stakeholders and champion collaboration to eradicate modern slavery.

Our vision is one where modern slavery has been eradicated within our industry and we are aiming to be recognised as a beacon of excellence within the modern slavery space, driving transparency, accountability and innovation throughout our operations and supply chains.



2024/25 progress

2024 was a year of consolidation for us as we continued to make progress with our work on combatting modern slavery. This section outlines our key actions and progress in the past year.

Partnership with Unseen



We were delighted and honoured to be shortlisted for two prestigious awards at the 2024 Unseen Business Awards: the Business Impact Award and the Individual Impact Award (the latter was a nomination by Unseen themselves).

This not only highlighted the impact of our ongoing efforts to combat modern slavery but also served as validation for all of the hard work that our team have committed to. Being acknowledged alongside respected organisations such as Lloyds Banking Group and Legal & General was a proud moment and one that reinforces our position as a responsible and ethical business.



Winning or even being nominated for an Unseen Business Award is a really powerful endorsement of a company's commitment to ethical practices in the modern slavery space and the nominations have underlined the importance for us of continuing to expand our efforts here.

We were especially proud of our **People Director, Claire Grant**, who was nominated by Unseen for the **Individual Impact Award**.

"I was exceptionally pleased to be nominated for the Individual Impact Award. It's recognition of our hard work as a business and really underlined the efforts made across Ground Control and the commitment we have made to tackling modern slavery."

Claire Grant, People Director, Ground Control



Leadership

All our people undergo annual e-learning training on modern slavery and key teams, such as People, Procurement and Supply Chain undergo enhanced training. Our aim is to ensure that those in key operational and support roles fully understand the risks that modern slavery presents to our business while equipping them to strengthen and evolve the systems we have in place to mitigate those risks. We are proud that 100% of our leadership, Procurement, Supply Chain, and People teams have completed this enhanced training, and that 95% of our employees have completed their online e-learning. We are working towards a goal of 97% completion for next year.

As part of our broader commitment, we also restructured and strengthened our Talent team to improve how we attract, recruit, and retain the right people. We introduced new leadership to the team through promoting our Modern Slavery Lead, Claire Grant, People Director to oversee the team and appointed a dedicated Recruitment Manager who is focused on enhancing our hiring processes and ensuring they are aligned with ethical standards and best practices. These changes are already driving more robust and transparent recruitment activity, reducing risk across our labour supply chain.

In conjunction with our new Modern Slavery Working Group, we continue to actively engage our leaders—providing them with the tools and training to guide their teams through management workshops, regular toolbox talks focused on modern slavery, and ongoing communications. This work aims to increase organisational awareness and promote accountability at all levels.

Additionally, we are proud to have contributed to the Unseen Business Impact Report, sharing our insights and initiatives as part of a collective effort to strengthen anti-slavery practices across the business community.



Governance

Now fully embedded in the business, our Modern Slavery Working Group, established in 2023, continues to play a pivotal role in overseeing and shaping our approach to tackling modern slavery. Chaired by our Chief People Officer, Lisa Blakey, the group is firmly established as the driving force behind our strategic and operational response to the modern slavery risks faced by our business. It continues to inform and advise both our Executive Committee (ExCo) and Board on key modern slavery-related issues.

Over the past year, the group has led the development and delivery of our Modern Slavery Strategy, ensuring it is aligned with our risk assessments, audit findings, and evolving business practices. It has also taken on responsibility for the regular monitoring and review of our Modern Slavery Policy, providing governance and direction across our operations. Working in close partnership with Unseen, the group has helped embed a number of changes into our recruitment, training, and supply chain processes, ensuring that our commitments are not only met but continually strengthened.



"Over the past year, our Modern Slavery Working Group has become a well-established part of how we operate, ensuring robust governance and high-level visibility of the actions we're taking to combat modern slavery. We've continued to drive accountability across the organisation and up to Board level, while continuously evolving and enhancing our processes to proactively identify, manage, and reduce the risk of modern slavery across every part of Ground Control's operations."

Lisa Blakey,
Chief People Officer,
Ground Control

Strategy

In 2024 we launched our Modern Slavery Strategy which sets out our approach to Modern Slavery based around four key principles:



1. Prevention

Preventing the risks of modern slavery occurring within our workforce or supply chain.



2. Identification

Identifying any possible instances of modern slavery, or risks within our workforce and supply chain.



3. Mitigation

Taking robust action where modern slavery risks have been identified and looking to reducing any likely impact on individuals or victims.



4. Remediation

Ensuring victims or survivors are supported to lead lives free of future risk.

The strategy sets out a focus on a number of core objectives. We intend to review the strategy annually, ensuring that all of the actions under our core objectives are delivered helping us to expand our approach to modern slavery and supporting our work towards achieving our vision of eradicating modern slavery within our industry.

Our progress against our strategy is overseen by our Modern Slavery Working Group with reports being reviewed bi-annually to ensure we remain on track to deliver.

Our focus is on five core objectives:



Education and awareness

Educating our people and building awareness to ensure they can recognise the signs



Responsible recruitment and procurement

Ensuring we engage and work with people and suppliers who align with our values and commitment to tackling modern slavery.



Effective speak-up mechanisms

Ensuring we are creating an environment where people are empowered to raise concerns and supported to do so.



Risk assessments and audits

Increasing our capability in this area to reduce the risk of modern slavery occurring within our business.



Remediation and victim support

Ensuring we work with partners to provide support for potential victims.

"Our modern slavery strategy not only underscores our commitment to tackling modern slavery risks in our business it also highlights our focus on ensuring combatting modern slavery is at the core of our business. In keeping our focus on this area we can not only build awareness we can make a real impact within our industry and for potential victims."

Darren Daley, Maintenance Director, Ground Control



Policies and Systems

In conjunction with Unseen, in 2023 we reviewed key policies including our Human Rights Policy, Recruitment Policy, Honest and Ethical Behaviour Policy and our Supplier Code of Conduct. We are confident they address the needs of our growing business and set out clearly our expectations of our people, Field Teams, Suppliers and Partners. All of our policies now provide a greater focus on modern slavery and make clear our commitments here.

Our policies are reviewed on an annual basis to ensure we are addressing new and emerging risks and that they align with the growth of our business. This year we launched a new Supplier Code of Conduct with the aim of making our commitment to tackling modern slavery clear and ensuring that our suppliers are held to the same standard. The new code was sent to all of our existing suppliers and their adherence will be reviewed as part of our ongoing supplier audits and reviews.



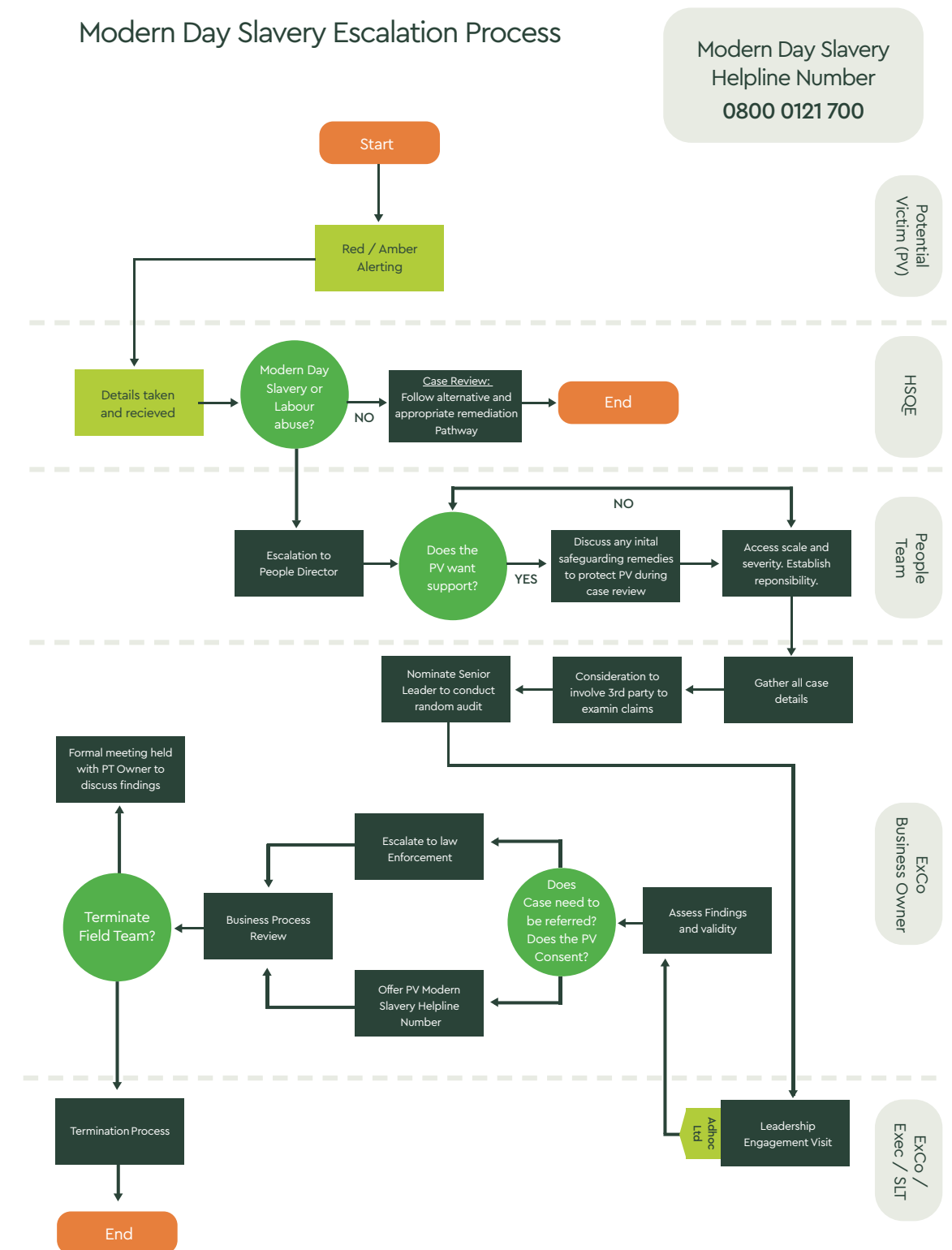
We continue to utilise Safecall as a provider of our whistleblowing helpline. This provides us with an independent verification process for any issue raised and helps us ensure we remain fully compliant with whistleblowing and data laws. Safecall are a market leader in the whistleblowing platform space and have worked with us to build a clear communications process. Our helpline number appears on all company ID cards and is shared with all our people along with the national Modern Slavery and Exploitation Helpline..

Safecall are at the forefront of our strategy to addressing modern slavery risks within our business and supply chain giving us the opportunity to provide a route for reporting of any issues within our business.



Escalations and Remediation process

2023 saw the launch of our escalations and remediation process, which sets out a transparent pathway for managing and addressing any modern slavery risks that are identified. The process is designed to ensure any of those at risk can voice concerns and seek an effective remedy. We aim to put victim support at the centre of any action we take, and to effectively respond to any modern slavery risks and ensure further risks are prevented.





Risk Assessments

Our approach to risk assessment and management concerning modern slavery continues to develop with our central corporate, modern slavery risk register forming the mainstay for collaborative identification & controls, this allows us to establish overall visibility within the business for risks and controls. It is our intention that we will further develop our risk assessments this coming year by building out our business unit risk registers to ensure close scrutiny and ownership within each of our individual operational areas and the identification of bespoke controls which aligns with specific works and client needs.

Currently our risk assessments are reviewed every six months and we have worked to align our modern slavery risk register with the ETI Base Code indicators to ensure that we are following and working to best practice.

All modern slavery risks are carefully assessed against the potential scale, scope and remedability resulting in initial and current risk levels within the register. An upgrade that has been incorporated is that now, future projects can be allocated against each risk directly within the register with an estimated future risk level associated, this allows the projects to be ranked based on their potential risk reduction benefit. The completion of the built-in project plans will trigger a risk review to see if these planned benefits have been realised.

Ground Control also regularly reviews the demographic data of its employees and field teams to allow us to provide accurate reporting that can be amalgamated with the statistics from our health surveillance

monitoring to help us identify areas where people may require additional support, this in conjunction with our neurodiversity support programme, SEND programme in Maintenance and fully embedded personal health risk assessment process should help our people to be as protected as possible.

We continue to focus on the increased risk to those with unusual working patterns such as night workers. This currently shows as one of our highest risk areas and in order to reduce this risk as far as practicable, we are implementing greater fatigue monitoring which identifies potential risks based on excessive working hours and triggers a requirement for individual personal fatigue risk assessments to ensure that the individuals overall health is protected and the risk of exploitation is not increased. This company wide solution will also shortly be available to our field teams and seeks to reduce excessive working hours. With increased visibility and control, regular or excessive working patterns can be referred to the Health and Safety team or Modern Slavery Working Group for further investigation.

We are also in the process of rolling out our lone working app to our field teams to provide them with greater support when working on their own on sites. We already use a Stay Safe app to provide lone worker controls, alarm functionality and emergency escalation but we plan to expand this to ensure field team operatives are able to access functionality through our SafetyCulture application which will allow the field teams even greater access than ever before to lone worker solutions.

Industry Risk

Ground Control operates across a multitude of industries, our partnership with Unseen helps supply us with up-to-date statistics on overall industry modern slavery risk trends, these statistics are documented as a part of our modern slavery risk register and ensures that additional scrutiny is placed on those areas of highest likelihood of exploitation in their supply chains, currently our LDE business unit holds the highest industry risk due to the nature of their supply chains. To mitigate this risk we are promoting our modern slavery controls extensively within that division and are providing regular reporting on compliance to the divisional leaders with best practice examples originating from this business unit to promote engagement

Supplier Risk

This year we continued to build on the supplier due diligence and review of supply chains for modern slavery risk, all new supplier, regardless of size undergo a minimum initial review of their modern slavery controls, with Tier 1 & 2 suppliers being required to provide

- Onboarding suppliers risk
- Supplier reviews
- Supplier risk register

We are proud of its approach to risk assessments and the level of controls we have implemented in the last few years. We continue to drive forward with continual improvement and aim to lead in the industries we operate in on the drive to eliminate the risk of modern slavery from our supply chains.

Labour Risk Assessment

We recognise that as an industry we continue to face challenges around diversity in many of our manual roles. This is an industry-wide problem and will require a collaborative response to drive change. We do, however, continue to make sustained efforts at recruitment to drive this forward. Over the past year we have continued to build on our approach by carrying out our annual labour risk assessment to identify areas of potential vulnerability across our business and to put in place targeted actions to mitigate them.

We continue to recognise that our manual workforce is at a higher risk of slavery and exploitation compared to our professional staff, and this remains the core focus of our due diligence activity. Among our manual employee population, female representation remains low at 2.9%, with all female employees working in teams, and the proportion of non-UK nationals stands at 2.03%. We remain vigilant to the risks associated with these demographics and maintain robust audit and due diligence processes to ensure all individuals are protected. While many of our roles remain low-skilled, we continue to make significant investments in our people. In 2024/25, 96% of employees have undertaken some form of training, reflecting our commitment to development at all levels. With 3.8% of our workforce now aged over 75, we have continued to invest in our health surveillance programme to ensure we are actively supporting the wellbeing of our older workers. Additionally, we continue to support our lone workers through the use of our Stay Safe app and ensure regular contact through scheduled meetings and audits with operational managers.

Audits

Our auditing and inspection regime continues to grow and develop, maintaining our catalogue of accreditations while providing the maximum time to our people to grow and thrive within their roles.

Over the last year we have refined our auditing methodology and ensured a teaching relationship with the auditees is established and maintained, referencing and interpreting clauses and best practice to allow our leaders and managers to understand not just what they need to do but why.

This focused approach has been translated into our site inspections as well, with every template in our new suite being packed full of information while making it easy for managers to highlight issues or raise concerns. We have just launched our new leadership engagement template which will build on our approach to giving operatives dedicated face-time with our leaders with an emphasis on welfare and conditions.

Site Visits

The Ethical Employment Checks that were implemented last year continue to form the mainstay of our modern slavery inspection regime, however this is soon to be bolstered by greater access to the resulting data, regular check in meetings to review numbers and findings and further roll out across all areas of GC. The promotion and roll out of this template has benefited from a collaboration between the People team, HSQE and the Modern Slavery Working Group. Ground Control continues to be fully dedicated to the roll out of this template and its potential benefits to the field teams we work with.

The scope of Ground controls health surveillance procedures are also being expanded to encompass all of our people. The template aims to identify any welfare or occupational health issues early and promote action to reduce risk and implementation of suggested controls.

Site visits are carried out across the business on frequent basis both by Contract and Operations Managers and leaders within the business. Visits are both scheduled and unscheduled and give us an opportunity to review the performance of the team and ensure that the team are working in line with our policies and processes. During all site visits team members are spoken to and their ID badges verified to ensure that only the individuals scheduled to be on site are there.

"Ground Control's audit function is committed to thoroughly examining our operations to ensure the highest standards of compliance and care—both for the people we work with and the industries we serve."

Phillip Marshall, Head of Quality, Ground Control



Data audits

We regularly conduct reviews of people and team data (including identifying duplicate details, right to work status and bank details) to allow us to identify any modern slavery risks. The scope of these reviews were expanded last year to provide greater visibility of potential risk areas and the outputs feed into our Modern Slavery Risk Register.

SMETA & EDI Base Code

We continue to work with SMETA in ensuring our supply chains have full visibility of our commitment to modern slavery within the industries that we work in, our compliance portal is now sitting at 100% population. We are fully committed to holding ourselves to the highest possible standard and want our portal to reflect this. In the next year SMETA have a new audit format being implemented which will better suit our field team model and we are looking forward to the additional improvement opportunities that these audits will provide.

Modern Slavery processing audits

Ground Controls integrated management system continues to grow from strength to strength, we are undertaking audits of each stage of our end-to-end projects process to identify any opportunities to enhance our controls and further cement the risk based approach which benefits the safety and wellbeing of all of our people.

Over the past year, we have continued to strengthen our approach to monitoring and managing our people data, building on the foundations set previously. Our data continues to be audited on a monthly basis, with regular checks in place to identify potential duplicate data points, including bank details, next of kin, and address information. Where duplicates are identified, we investigate the reasons thoroughly. As a small business with a number of family members working together, duplicate information can be expected, but we continue to validate these instances to ensure accuracy and mitigate any potential risks.

Our payroll audits have also remained a key focus, particularly as we implemented a new payroll system in 2025. Our new system provides a greater level of automation and allows for a greater level of oversight of our monthly payroll data. Monthly reviews ensure that all employees are paid at or above real living wage levels, and that overtime payments remain in line with reasonable working hours. Where patterns of extended hours are identified, we engage directly with those individuals to better understand the underlying reasons and ensure appropriate support is provided. Over the last year, this process has helped us intervene early in several cases to promote employee wellbeing and prevent fatigue-related risks.

Later this year we are also undertaking a full end to end review of our modern slavery controls to ensure that they continue to remain fully compliant year on year.

Auditing systems

Any nonconformities or opportunities for improvement raised during the audits are managed through our Ground Control Auditing tool. The tool has recently undergone some upgrades which allow findings to be directly linked to clauses within our accreditation and compliance requirements such as BS 25700 – Organisational responses to Modern Slavery.

Working at Ground Control

Our people

At Ground Control, we are deeply committed to supporting our people and minimising the risks of modern slavery within our operations. We are proud to be an accredited BCorp employer, and have Investors in People and Best Companies status, all of which recognise our investment in our people and our commitment to creating an inclusive, sustainable and ethical employment environment..

As a Real Living Wage accredited employer, we ensure all of our employees receive fair and equitable compensation for their valuable contributions.

We prioritise the financial stability and wellbeing of our employees, and work hard to ensure fair and equitable reward policies for all of our employees. We have a hardship fund which all employees can access to provide grants and we are proud to have supported a number of employees to get out of debt and pay unexpected bills.

Our annual engagement survey provides us with valuable insights into the experiences and concerns of our workforce, allowing us to identify areas for improvement and tailor our strategies accordingly. This year we changed our survey provider and have focused our questions to enable us to identify the key drivers of engagement across our business. Happily, our employees have continued to indicate they feel Ground Control to be a supportive and ethical company where they enjoy working for their managers and colleagues. As an indicator of engagement, last year we had a 91% response rate to our survey.

Our survey indicated that we needed a closer focus on communications and a new Communications Director joined the business in 2024. Over the last year she has fully revamped our communications strategy and helped us build out our leadership communications as well as supported our focus on modern slavery. We also changed our employee engagement survey, moving to an external provider that will help us maintain a focus on the key drivers for engagement ensuring that we maintain our values driven culture.

We continue to maintain strong policies designed with a clear focus on supporting our people and upholding their rights. We maintain clear Human Rights, Grievance Whistleblowing and Modern Slavery policies, providing transparent guidelines for addressing any concerns or issues that arise. Our robust recruitment process ensures that we hire ethically and responsibly, with rigorous right-to-work checks, ongoing data audits, and personalised meetings for every candidate with our talent team members who are trained in identifying signs of modern slavery at interview stage. We have further invested in our recruitment team this year by appointing a dedicated Recruitment Manager and transferring their reporting lines and responsibility to our People Director and modern slavery lead. All our processes are mapped and reviewed annually, with monthly audits to ensure we adhere to them and to identify areas of risks. Our audits are detailed and we aim to ensure we identify and mitigate any factors that may lead to modern slavery risks.

Our Learning and Development interventions have also continued to expand and this year, alongside our structure management and leadership development

programmes and modules we have invested into a series of courses on managing conflict and difficult conversations. It is our intention that investing in these skills will enable us to continue to underline our existing culture within which we value questioning and challenge as a way of pushing ourselves to overachieve in all areas.

At Ground Control, treating our people with dignity, respect, and fairness remains central to our culture. While we continue to recognise that the risk of modern slavery within our organisation cannot be entirely eliminated, we have enhanced our awareness of potential risk areas through regular Labour Risk Assessments and ongoing welfare audits. We have also maintained and further developed robust processes to safeguard our many lone workers, identifying and addressing risks through proactive support systems.

Additionally, Additionally, we have sustained our focus on supporting potentially vulnerable demographic groups through active health surveillance. This has enabled us to better identify and respond to health and wellbeing needs, particularly among older members of our workforce.





Recruitment

Our recruitment process has always been a key focus for Ground Control. We believe strongly in hiring people not just with the right level of technical competency but with the right values fit for the business. This year we merged our talent team with the HR team with the aim of building out a focus on process and ensuring that we introduced a level of robustness and a greater assessment of technical competency. This is about helping our business to scale. Our Talent team will again go through enhanced training on modern slavery. There has been a significant level of turnover in the team as we have performance managed and we want to ensure they remain well versed in the signs to look out for. This will include a greater focus on hiring manager training which will enable us to highlight risk areas to hiring managers and further engage them in our actions to combat modern slavery throughout our employee journey.

Following a recruitment assessment process all employees joining Ground Control onboard via a digital process within our Applicant Tracking System (ATS), Team Tailor and our People System, Bob. Through this process we review and audit all candidate details and employment history. Our data is audited to identify modern slavery risks by the recruiter and at the end of 2023 we automated our right-to-work checking process using Zinc. This provides a greater level of robustness

and ensures we minimise the risk of engaging someone who does not have the appropriate documentation to work in the UK. Because Zinc can check only UK and European Union documentation, all visas are checked by the Talent team and managers.

In 2024 we onboarded more than 250 employees through Team Tailor and had their right-to-works checked via Zinc.

As part of our commitment to engaging with our local communities one of the key aims of our Talent team is to actively partner with providers who can help us reach more diverse candidate pools, including care leavers, individuals with special educational needs and individuals who have been in prison. We recognise that individuals from these groups may face particular risk factors that could make them more vulnerable to exploitation. We are committed to working closely with our partners to ensure that appropriate safeguards are in place, including providing a strong level of pastoral care and ensuring that our managers are trained to offer the right support. This approach forms part of our broader commitment to promoting equality of opportunity while helping to prevent modern slavery and exploitation in our recruitment practices.

Training and awareness

One of our key focuses for 2025 continues to be raising awareness among our people and teams of the risks of modern slavery within our business and ensuring that we work together to address these risks effectively.

We are pleased to report that we met our KPI of achieving a 95% completion rate for our mandatory modern slavery training. This is a significant achievement and demonstrates our continued commitment to equipping our people with the knowledge and tools they need to identify and report concerns.

We are now focusing on maintaining this high standard and will continue to provide enhanced training for key teams including Procurement, Supply Chain and the People teams. We have seen a high level of turnover in our Talent team and need to ensure that we continue to build their confidence in recognising and managing modern slavery risks when engaging with and onboarding candidates.

We remain conscious of the need to keep modern slavery training front of mind for our Field Teams, who play a key role in safeguarding. To support this, we have been rolling out face-to-face modern slavery training for major contract mobilisations, ensuring that our teams are well prepared from the outset and that they are equally as committed to working with us in combatting modern slavery.

All new starters continue to complete an e-learning module on modern slavery, with annual refreshers required for all employees. Our training, which also remains mandatory for Field Team operatives, has been audited by Unseen and is a crucial part of our approach to raising awareness.

Training is reviewed annually and audited on an ongoing basis as part of our partnership with Unseen. Alongside formal training, we continue to drive awareness through ongoing communications, regular updates to employees and Field Teams, and the ongoing work of our Modern Slavery Working Group.

While no instances of modern slavery have been reported to date, we remain vigilant and confident that our teams understand both the risks and the reporting processes.



Case study

Roy Candlin, Account Director

Championing Inclusive Employment for Individuals with Special Educational Needs

In 2017, Roy Candlin attended a presentation on the transition from education to employment for young people with Special Educational Needs and Disabilities (SEND). With national employment rates for SEND school leavers at just 6%, he was determined to make a difference.

With encouragement and backing



"94% of anybody diagnosed with the likes of autism, ADHD or any other form of learning difficulty didn't do anything in life. Society was against them, and that ultimately meant that that shortened their life expectancy. I was mortified."

Roy Candlin,
Account Director,
Ground Control

from Ground Control's leadership, Roy partnered with Staffordshire College and developed an employability program tailored to SEND individuals. His goal was clear: create a work-based training environment that met people where they were, not where traditional systems expected them to be.

Rather than rely on classroom-based delivery, Roy designed hands-on, sensory-led training grounded in repetition, structure, and individual strengths. From plant identification activities to machinery handling, the programme builds confidence and capability through real-world experience.

Since launching, the programme has supported a growing number of young people who previously struggled to find their place in education or employment. One early success story, Wayne, had been excluded from mainstream classrooms due to behavioural triggers. With time, trust, and access to practical work, he found focus and fulfilment outdoors, earning multiple qualifications and now managing an 84-acre commercial site independently.

Another graduate, Ken, was unable to remain in a classroom for more

than 15 minutes. Through Roy's support, he successfully completed his apprenticeship and now thrives as a key member of a mobile team.

"The whole point of the program is you have to take every individual on a case-by-case basis. Ken much prefers having someone to cheer him along, Wayne is more focused in taking ownership and wanting something to be right from start to finish."

At the heart of the programme is a proactive and person-centered approach to safeguarding. Each participant is assessed individually, with expectations and support tailored to their needs and vulnerabilities.

Measures include:

- Daily and weekly welfare check-ins, both formal and informal
- Modified learning formats for mandatory training (e.g., modern slavery awareness), where staff sit with learners to walk through digital modules, clarify content, and guide them through questions
- Adjusted use of systems such as job scheduling tools to avoid overwhelming participants
- Mentoring and supervision

protocols that reflect their preferred working styles

The programme also actively addresses risks of modern slavery and exploitation, which disproportionately affect vulnerable individuals, including those with SEND. Challenges such as communication barriers, social isolation, and lack of awareness can increase the risk of coercion or unsafe employment.

To mitigate these risks, the programme embeds accessible modern slavery training, helping participants:

- Understand what constitutes exploitative or forced labour
- Recognise red flags in the workplace
- Know who to speak to if something feels wrong
- Understand their rights to fair pay, safe working conditions, and respectful treatment

This tailored approach ensures learners not only complete compliance training but genuinely understand it, equipping them to stay safe, and avoid dangerous or unethical employment situations.

Importantly, Roy extends this

safeguarding model beyond the workplace. He actively engages with parents and guardians to ensure that participants receive consistent support across home and work life. In addition to professional skills, the program provides coaching in core life competencies: hygiene, communication, travel independence, timekeeping, and financial literacy. Participants learn how to prepare for work, interact with clients, manage their wages, and build routines that support long-term independence.

This commitment to wraparound support is why Roy's former apprentices are not only still employed, but thriving in roles they take pride in, with aspirations they never thought possible.

One year on, the programme continues to grow. New intakes are already planned, with increasing engagement from the Department for Work and Pensions, specialist SEND schools, and community partners. Roy regularly delivers outreach sessions and school visits to raise awareness and expand access to employment pathways.

His work has also received strong backing from Ground Control's senior leadership. Darren Daley, Grounds Maintenance and Client Services Director, has been a vocal supporter of the programme and personally presented Ken with his apprenticeship certificate and official Ground Control kit.

Roy also serves as a governor at a specialist college for SEND students, helping shape employability outcomes for over 200 learners. The reach and impact of his work continues to grow, driven by his belief in the untapped potential of individuals who are so often overlooked.

"One of our mottos is investing in people... they're some of the best people I've ever worked with."



Modern Slavery in Ireland

In 2024, Ground Control expanded our operations into the Republic of Ireland. Whilst our expansion into the island of Ireland is an exciting stage of growth for us, we are aware that territorial expansion brings new risk which must be considered as part of our modern slavery risk register and strategy. To this end, the modern slavery committee is extending the scope of our existing processes and controls to encompass this new region.

Modern slavery risk management strategy

While conformity to the British standard for modern slavery is not requested by our clients nor required under Irish law, we are holding ourselves to the highest standard regardless, it is hoped that this will lead the way in modern slavery risk in the region and inspire others to adopt similar practices.

Partnering with Sodexo we have joined the Ireland Modern Slavery Council and we hope to utilise this to create and maintain a focus on modern slavery across our Irish operations whilst partnering to ensure that tackling modern slavery becomes a key focus area for our industry across the country.



Our Field Teams

Ground Control operates through a network of more than 1000 Field Teams across the UK and Ireland. These teams are individual sole traders, partnerships or small limited companies and are specialists in delivering work to our clients.

Many of our competitors utilise agency workers to deliver work on site, creating significant modern slavery risks and an inability for them to check and ensure that individuals have the correct right to work and qualifications to deliver work. Our Field Team model reduces the risk of modern slavery issues to both us and our clients and enables us to remain close to the individuals delivering work on our behalf and enables us to know who exactly is delivering the work, what their qualifications are and what their employment status is.

All of our Field Teams go through a rigorous induction process managed by our Supply Chain team. Each Field Team has a dedicated sponsor within our operation and they are responsible for working with the team and ensuring they meet all of our requirements. We check right to work for all operatives ensuring that they are able to work in accordance with Section 8 of the Asylum and Immigration Act 1996. Through the implementation of the Skillko platform we have provided a self-service tool for our field teams to manage their compliance in real time to ensure efficiencies and accuracy in line with legal and operational requirements. This tool will enable field team owners to 'manage the gaps' as they arise while ensuring full visibility and reporting across our business giving field teams all certificates and compliances in one place so their compliance passport is available when required on site to our clients. All teams and operatives are assessed against our detailed requirements matrix and no teams are allowed onto site unless their compliance is 100% up to date.

All operatives also undergo annual modern slavery training and we have built face to face training into any new large scale contract mobilisation giving us the opportunity to meet our operatives face to face and ensure that they fully understand our commitment to tackling modern slavery.

Field Team owners are required to agree to Ground Control's Framework Agreement. This is a pre-condition of engagement, and non-agreement precludes the team from being onboarded. The Framework Agreement mandates full compliance with both the Modern Slavery Act 2015 and the Gangmasters Licensing Act 2004. Ongoing Field Team audits are carried out to assess compliance with these requirements and include review of payroll, contracts and employment data for every operative.

We utilise mobile applications to capture real-time operative, task, and timing data at key stages of each site visit. This includes recording when teams arrive and depart from sites. The data is integrated into our web-based platform, TotalView, which provides live visibility and alerts on field team activity. This system enables us to locate teams accurately and conduct unannounced site audits, an essential component of our approach to identifying and addressing risks related to modern slavery. These audits support both detection and ongoing awareness efforts across our operations. We will work with teams to formulate their own modern slavery and ethical working policies if these are not already in place while further educating them on the risks associated driving further understanding across their communities.

We work closely with our Field Teams to support them in demonstrating compliance. This includes providing them with Modern Slavery and EDI (Equality, Diversity, and Inclusion) policies, as well as assisting them in developing their own recruitment processes, particularly for small micro-entrepreneurs, whom we actively support and nurture. We offer a recruitment guide that outlines compliance expectations and will also help these teams when bidding for broader contracts.

Additionally, we have a dedicated Compliance Lead who is responsible for driving compliance initiatives and raising awareness across both the business and our field teams.

Our Suppliers

We have continued to evolve our approach to procurement and supplier management and have taken a number of steps this year to develop our processes to ensure that we continue to work only with suppliers who align with and support our values. We actively engage with our suppliers on modern slavery and human rights topics and encourage our suppliers to make the same commitments we do including our commitment to paying the real living wage.

When onboarding our suppliers we carry out an assessment to examine their suitability to work with Ground Control. Specifically, we are looking for evidence that they not only meet minimum legislative requirements, but that they look to go above and beyond here. These detailed assessments are then reviewed by the Supplier Onboarding Team

who look for evidence they are compliant with our policies and processes relating to modern slavery and sustainable and ethical practices. We look to measure their level of robustness and ensure their actions align with our requirements set out in our Sustainable and Ethical Procurement Policy.

A key part of our assessment is reviewing their own modern slavery statement. If a supplier does not have a statement we still request details of what they do to ensure they reduce and mitigate the risk of Modern Slavery within their supply chains. In addition, we request our supplier upload their Code of Conduct, or if they don't have one, then to adhere to our Supplier Code of Conduct which details our commitment to tackling modern slavery.

Our focus over the past year has been on building out our supplier onboarding process to enable us to better identify suppliers who are aligned with our commitment to combat modern slavery risks within our business and supply chain. A revised assessment was launched to identify what they are doing to actively manage and mitigate the risk of modern slavery in their supply chain. We have also retrospectively issued to all existing suppliers that have been previously onboarded to ensure a thorough assessment of our existing supply chain.

All of our suppliers are tiered and all top tier suppliers (which represents 80% of our supplier base) are currently audited on modern slavery prior to holding our Supplier Relationship meetings, and actions are agreed and outlined in a Joint Supplier Plan (JSP).

Subsequent meetings then focus on achievements against the actions in the JSP.

Prior to onboarding we assess the supplier based on the type of work they do and classify them accordingly. Then based on our Supplier Risk Register, we determine whether the supplier is at a high risk of modern slavery. If so, then this supplier also receives a more detailed post-onboarding questionnaire which is designed to better understand how they manage and mitigate modern slavery risks in their supply chain.

In 2024 we also launched an updated Supplier Code of Conduct which we ask all suppliers to agree to, if they don't already have their own code of conduct. This has been sent out to all suppliers who

have been asked to signal their commitment to it.

We have yet to experience any instances where modern slavery has been identified within our supplier chain. We suspect much of this has to do with the use of small, local businesses and ones we have worked with for years. If we did our intention would be to engage in full with the supplier to support them in managing the issue. We believe arbitrarily exiting a supplier would lead to us failing in our commitment to tackle modern slavery and potentially create further risk for victims. We will, therefore, offer to work in tandem with any supplier and involve specialist parties and law enforcement where necessary.

All of our suppliers are given access to our Modern Slavery and

Whistleblowing Policies although we do recognise we need to improve our communication processes here. We have made slower progress than hoped in the last year within the Procurement space and we will focus on continuing to engage with our suppliers as well as working with Unseen who will carry out an audit of our processes and approach to ensure we capture and mitigate any modern slavery risks with our suppliers.



How we performed against our aims and KPIs in 2024/25

We worked extremely hard as a business in 2024/25 to ensure that we met and exceeded our KPI'S, related to modern slavery risk management and awareness. We are confident that modern slavery is now embedded as a core focus across our operations, with strong efforts made to build awareness across all teams and partner organisations.

We successfully delivered training to employees and all eligible Field Teams. However, we faced challenges in reaching some Field Teams, as many do not have access to computers. To address this, we allocated dedicated time to support their training and will continue to prioritise face-to-face engagement during site audits in the year ahead.

Procurement remains a critical focus area, with much of the supplier oversight work still conducted manually. We are investing in further training for our procurement team and have commissioned an independent external audit this year to test the effectiveness of our processes. We also intend to explore opportunities for greater digitalisation and automation of key procurement tasks, ensuring modern slavery remains a core agenda item in supplier meetings. The rollout of our new Supplier Code of Conduct in 2024 has helped set clearer expectations across our supply base. While we met our procurement KPIs, we recognise that continued support and development of our internal capabilities is essential.

All Field Teams were issued updated policies on Modern Slavery, Whistleblowing, and Equality and Diversity and asked to implement these templates within their business. Ensuring that we build out focus on these policies will be a key priority for the coming year, and we will enhance monitoring and engagement to improve compliance and understanding.

Our audit programme remains robust, with regular on-site audits conducted throughout the year. In 2024, we introduced improved audit templates to strengthen reporting and consistency. These audits continue to be an essential part of our approach, and we are committed to maintaining this level of oversight going forward.

"I'm proud of Ground Control's unwavering dedication to tackling modern slavery. It's not just about meeting compliance requirements – it's about genuinely protecting vulnerable people, raising awareness across our teams, and setting sector-leading standards for ethical working practices."

Katie Lambert, Compliance Team Leader, Ground Control



Our aims for 2025/26

Building on the strong foundation laid in 2023/24 we have made strong progress towards our ambition of becoming a leading organisation in the fight against modern slavery. Over the past year we have maintained our focus on this issue, recognising that continued commitment is essential and that complacency is not an option.

Against the objectives we set last year, we have seen encouraging progress, including the implementation of our modern slavery strategy. However, we are clear that more remains to be done. Looking ahead, we remain committed to deepening our efforts. In addition to our ongoing actions, we have identified several focus areas for the coming year, all of which build on our previous work.

These key focus areas are:

- Implement the actions in our modern slavery strategy in full, continuing to work towards the core objectives outlined within our strategy. This will allow us to continue to enhance awareness of modern slavery across our business and within all of our partnerships.
- Continue to broaden and deepen our relationship with Unseen UK to help develop our awareness of new and emerging threats in the modern slavery space and help us develop our policies and processes and actions to ensure they remain robust.
- Continue to train and enhance awareness of modern slavery, particularly within our Field Teams.
- Continuously review our approach to risk assessments across the business, including our labour risk assessment for Field Teams and their operatives so we have a comprehensive understanding of our risk areas.
- Continue to take a proactive approach to supplier due diligence whilst expanding our risk assessment approach.

KPIs for 2025/26

We have a set of Key Performance Indicators (KPIs) which will help us monitor the effectiveness of our actions. They were developed in line with our priorities for the upcoming year, and will allow us to track our progress.

KPI	Target	Reasoning
Ground Control culture – employees feel Ground Control is driven by outcomes and values as well as profit.	80%	Question in the Ground Control Engagement Survey: "Ground Control is driven by outcomes and values as well as profit."
Training – employees and Field Teams are aware of the risks of modern slavery.	97% of all employees complete training in modern slavery and human trafficking. 85% of Field Team operatives completed training in modern slavery and human trafficking. 100% of leadership team have been through enhanced modern slavery and human trafficking training.	Demonstrates awareness of the causes, risks and issues related to modern slavery and human trafficking.
Modern slavery risks are proactively assessed via our supplier onboarding channels.	Continue to position Modern Slavery as an agenda item for all Tier 1 suppliers in Supplier Relationship meetings and in Joint Supply Plans, including auditing Tier 1 suppliers to ensure they are managing and mitigating all risks. 100% of all new suppliers are to either have their own Code of Conduct or to agree to our Supplier Code of Conduct which details our commitment to tackling modern slavery. 100% of all new suppliers who are classified as high risk of modern slavery on the Supplier Risk Register to receive the enhanced modern slavery questionnaire and assessment with the team prior to onboarding.	Demonstrates awareness of the causes, risks and issues related to modern slavery and human trafficking. Enables greater focus on our suppliers and their activities.
Field Teams are actively engaged with combatting modern slavery.	50% of Field Teams who implement their own modern slavery, whistleblowing and equality policies.	Demonstrates awareness and commitment from our Field Teams.
Adherence to modern slavery best practice provisions across the Ground Control group.	At least 12 audits to be completed annually if a member of an operational leadership team. At least four audits to be completed annually if a member of a non-operational leadership team.	Enables organisation to identify risks and look to address concerns raised while demonstrating leadership commitment to eradicating modern slavery.

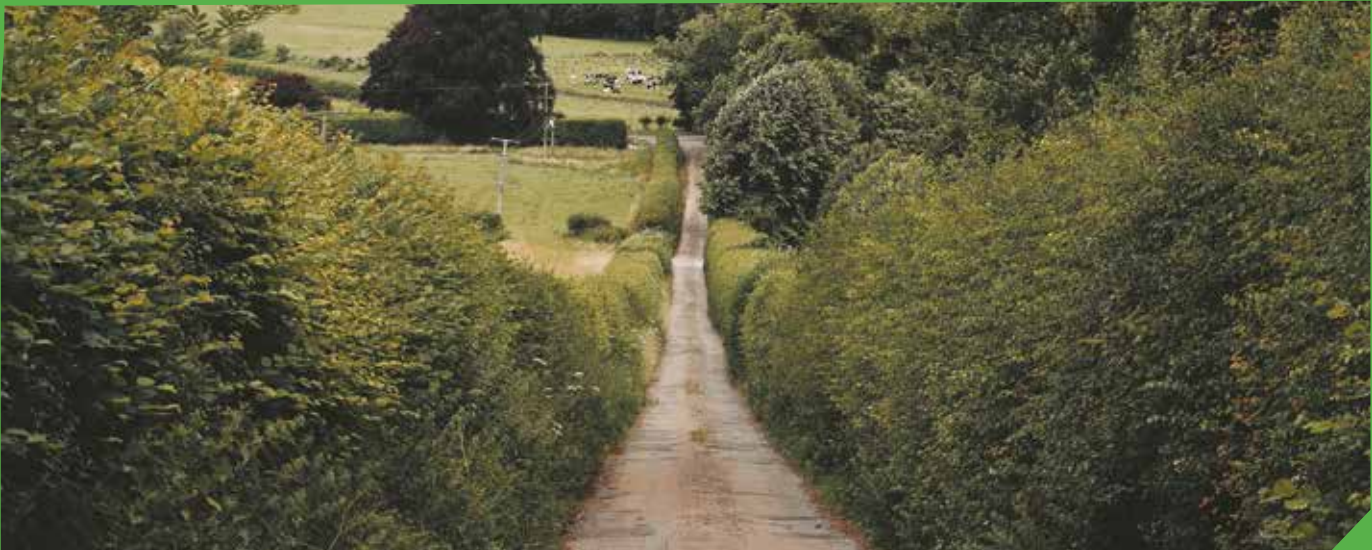


Conclusion

Over the past year, we have remained vigilant in monitoring and addressing modern slavery risks within our business and supply chain. We continue to work closely with Unseen UK, as well as our employees, Field Teams, and partners, to identify and mitigate both known and emerging risks. We recognise that the landscape is constantly evolving, and we remain committed to responding to new challenges as they arise.

Our zero-tolerance approach to modern slavery remains firmly in place, underpinned by robust policies, processes, and ongoing oversight. Through our partnership with Unseen UK, we have strengthened our practices and reinforced our ability to respond swiftly and effectively to any issues that may arise.

As we move forward, we will continue to build on this work, embedding modern slavery prevention deeper into our operations and culture, and ensuring that combatting modern slavery risks remain a core part of how we do business.





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