

MI-GSO|PCUBED UK - Modern Slavery and Human Trafficking Statement - Financial Year 2021

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015 (“the Act”). It sets out the steps Program Planning Professionals Ltd (t/a MI-GSO|PCUBED) has and will take to address and prevent slavery and human trafficking from occurring in our business and our supply chain. This statement covers our financial year 2021 which ended on 31st December 2021.

We are committed to conducting our business in a manner that prevents modern slavery. We believe the risk of slavery and human trafficking in our business (professional services) is relatively low, however we recognise that we must be proactive in our approach to assessing risk and we remain focused on reviewing and assessing our supply chain. We believe in continuous improvement, and in this our first statement, we set out the steps we have taken to embed due diligence which is appropriate to the risk.

Our Organisation

Our Structure

MI-GSO|PCUBED is a leading global professional services company dedicated to project, programme and portfolio management delivery to clients across the public and private sectors. With over 300 employees, our UK business is a trusted delivery partner of the most recognisable in brands in Aeronautics, Defense, Automotive, Transport, Financial Services, Energy as well as government organisations.

We employ staff and contractors to deliver services to our clients and to conduct our business operations. Our UK Headquarters is located in the City of London and facilities support roles (e.g., cleaning, maintenance, catering) are typically undertaken by third party suppliers.

Incorporated as a Limited Company in the UK, MI-GSO|PCUBED (“M|P”) is a wholly owned subsidiary of ALTEN SA. Our UK company registration number is 3025947. For more information about the company, please visit our website: <https://www.migso-pcubed.com/#home>

Our Values

M|P’s employee code of conduct is encapsulated in our TRIPPLE values which are embedded into everything we do. Integrity is central to who we are. We strive to maintain the highest standards of employee conduct through the demonstration of these values:

- **Teamwork:** Bring the best of our company to every engagement & act as One Team
- **Responsive:** Proactively help colleagues & clients to achieve combined goals
- **Integrity:** Unwaveringly demonstrated in all interactions and live by our commitments
- **Practitioners:** Always delivering the best business results
- **Passion:** With our expertise & client interactions
- **Learning:** For professional excellence
- **Empowered:** To improve self, clients & colleagues

Our Policies and Practices

Our Corporate Social Responsibility

Our Corporate Social Responsibility Programme is structured around three core pillars each containing a portfolio of goals and projects, based on the ISO 2600 standards. These pillars are **Deliver** (Deliver Green Together), **Reach** (Equality Diversity and Inclusion) and **Assure** (Wellbeing & Work from Anywhere).

We are proud to have very active communities in the UK and around the globe that play a crucial role in enabling a better future. Our commitment to CSR goes beyond being a corporate priority and is embedded in our individual responsibilities.

MI-GSO|PCUBED, as part of the ALTEN Group of companies, integrates socially responsible behaviour into our organisations through the below charters and policies which are applicable to all employees in every country which the Group operates:

- **Sustainability Charter-** Through this [charter](#), Alten undertakes to promote a corporate social responsibility initiative within its companies. As well as the commitment to comply with the laws and rules of good governance, this initiative is based on the fundamental principles of fairness, valuing employees, protecting the environment and developing environmentally friendly service offerings. In this way, ALTEN Group intends to make an active contribution to sustainable development.
- **Responsible Purchasing Charter-** Our Group undertakes to respect the 10 principles of the Global Compact, the Universal Declaration of Human Rights of the United Nations, the various conventions of the International Labour Organisation and the OECD Guidelines for Multinational Enterprises. Our procurement policy and practices ensure fair treatment, independence, fight against misappropriation, transparency in choices and decisions, and ongoing improvement for mutual interest.
- **Anti-Corruption Code of Conduct** - the ALTEN Group has put Ethics and Sustainable Development at the heart of its [strategy](#) and is building its growth around two basic principles of integrity and transparency.
- **Ethics & Compliance Charter-** Our Group is built on a bedrock of fundamental [principles](#) of integrity and transparency. These principles are implemented by management and employees alike in order to establish lasting relations of trust with its employees, personnel representation bodies, clients, shareholders, suppliers, competitors and all of its partners.
- **UK Carbon Reduction Plan-** To comply with the UK Government's Policy Procurement Notice PPN 06/21 we have published the first iteration of [our carbon reduction plan and our journey to net zero in the UK](#). This document sets the baseline for future years' reporting, and we are actively working on further environmental and sustainability initiatives to support progress.

To find out more information about our Corporate Social Responsibility, our labels & certifications, click [here](#).

In addition, we have related UK policies which demonstrate our commitment to ethical practices in every aspect of our business:

- **Whistleblowing policy** We encourage all our colleagues, clients and other stakeholders to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for colleagues to make disclosures, without fear of retaliation, and we thoroughly investigate any disclosures. To date, there have been no whistleblowing disclosures relating to modern slavery.
- **Anti-Corruption and Bribery Policy** – Our policy makes it clear that all our business must be conducted in an honest and ethical manner. We have a zero tolerance towards bribery & corruption, and we are committed in acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

All policies are available for our colleagues to access on our intranet site.

Our Suppliers

We purchase goods and services from a variety of suppliers in the UK. We have identified the main categories of purchasing during the reporting period as:

- Facilities (i.e., cleaning services, waste management, trades people)
- IT- Software & hardware
- Professional services (i.e., legal services, associates)
- Office space, events & hospitality
- Training

In addition during the reporting period we undertook a one-off refurbishment of our UK Headquarters and engaged with the relevant supply chain with regards to:

- Design, Build and Construction Services
- Office furniture
- Technology

Due Diligence & Risk Assessment

We consider that our supply chain presents a relatively low risk with regard to slavery and human trafficking. Nonetheless we audit our suppliers and we are committed to work only with organisations who share our values and who are also committed to playing their part in the eradication of slavery and human trafficking. We review the controls which our suppliers have in place and require confirmation that they are committed and are taking action to prevent modern slavery and human trafficking.

We ask that the businesses in our supply chain, including the sub-contractors and service providers we work with, adhere to our expectations in respect of their workforce. For example, we ask the businesses in our supply chain to confirm that they abide by local minimum wage standards. For suppliers that fall within the scope of the Modern Slavery Act with >£36m global consolidated revenue we would ask them to provide a copy of their current Modern Slavery Statement.

With regard to our own employees, our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm details of offers made. We have robust procedures in place for vetting of new employees, confirming identities and ensuring they are paid into an appropriate personal bank account.

Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Our effectiveness in combating slavery and human trafficking

During 2021 there were no concerns reported to us via our Whistleblowing policy (or any other channels within M|P) relating to slavery and human trafficking or in relation to any sub-contractors, service providers or other companies with whom we partner.

The directors of M|P shall take responsibility for implementing this policy statement and shall provide adequate resources to ensure that slavery and human trafficking is not taking place within the organisation or our supply chain.

We will continue to monitor and review our policy. If we become aware of any breaches of our policy we will investigate and take such steps as are necessary to minimize the risk of any further breaches occurring.

Our Commitment

We will continue to build capabilities and provide relevant training to ensure that our employees are well-informed to deal with the risk of modern slavery.

We will aim to work with our 3rd party suppliers in mitigating the modern slavery risks in our supply chain and taking appropriate remediation actions where required.

We will continuously realign and implement appropriate measures in line with government guidelines in reducing modern slavery risks in our business and supply chain.

Approval and Signature

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 31st December 2021.

This statement will be reviewed annually and is signed by Richard Siddle, Director and General Manager on behalf of Program Planning Professionals Ltd (t/a MI-GSO | PCUBED) in the United Kingdom.



Richard Siddle
Director & General Manager
June 2022