

## MODERN SLAVERY STATEMENT

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### A. ORGANISATION

This statement applies to Organisation (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year to March 2024.

### B. ORGANISATIONAL STRUCTURE

The Organisation is a Private Limited Company that operates predominantly on our client's own sites delivering professional cleaning and support services. The services provided includes directly- supplied works such as office and general cleaning whereby the labour is employed by the organisation and specialist tasks which are sub-contracted to specialist professional companies who employ their own labour. Examples of sub-contracted works include specialist window cleaning and waste management services.

The demand for our services is consistently high and the trend is that the organisation is continuing to grow accordingly. However, there is invariably fluctuation according to the number of contracts awarded, retained, or lost but this does not reflect any seasonal requirements.

The Organisation is controlled by two Executive Company Directors, who are part of the original founding family. These directors carry the titles of Chief Executive and Managing Director. Specific departments within the Organisation are controlled by functional Directors relating specifically to Financial, Commercial, Operational and Human Resource activities. Subordinate to these Directors are further Managers and employees who perform specific duties within each department.

All activities are administered and co-ordinated from a central Head Office which is located in Bishop's Stortford, Hertfordshire and this is where the support function is predominantly based.

Operational requirements are completed by structured teams of managers whose remit is to organise, control and manage the contractual requirements of our clients. These teams are generally headed by either a Senior Operations Manager or an Account Manager who report directly to the Managing Director. Subordinate to the Senior Operations Managers is either a Site or Area Manager who is further supported by a Site or Area Supervisor.

The labour supplied to the Organisation in pursuance of its operation is carried out predominantly throughout London the South East and Home Counties regions. The Organisation does not operate outside of the United Kingdom.

### C. DEFINITIONS

The Group considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity, or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

## D. COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employee.

## E. SUPPLY CHAINS

In order to fulfil its activities, the Organisation's main supply chains include those related to the supply of cleaning materials, equipment, and machinery from various suppliers in the United Kingdom.

We understand that the Organisation first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers. However, the organisation insist that first-tier suppliers fully agree to and endorse its own Ethical Purchasing Policy before such suppliers are included in the Approved Supplier List and can commence with the provision of goods.

## F. POTENTIAL EXPOSURE

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in its clothing supply chains because they may involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## G. STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- ensuring suppliers agree to and endorse the DOC Cleaning Ethical Purchasing Policy.
- reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- ensuring that the Organisation's recruitment policies and procedures include a zero tolerance towards any sign of potential modern slavery.

## H. KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- Reviewing supplier performance in relation to adherence to the Ethical Purchasing Policy and Approved Supplier criteria; this process is completed using Supplier Appraisal questionnaires which are required for completion on an annual basis.
- Reviewing the effectiveness of the Recruitment Policy; this process includes a review of the various countries that our staff are originally from and analysing any concerns on the potential for acts of modern slavery to be in effect from various regions.

## I. POLICIES

The Organisation has the following policies which further define its stance on modern slavery:

- modern slavery policy
- human rights policy
- business ethics policy
- ethical purchasing policy
- corporate social responsibility policy
- recruitment policy

These policies are available to view at any time upon request

## J. SLAVERY COMPLIANCE OFFICER

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation obligations in this regard. This officer is Jane Malone who is the Human Resources Director

*This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.*

Name: Lee Andrews

Position: Chairman/CEO

Signature:

A handwritten signature in black ink, appearing to be 'Lee Andrews', written over a light blue horizontal line.