

## **Modern Slavery Policy**

### **Scope**

Clean Linen Services is committed to ensuring that all individuals are treated with fairness, dignity, and respect, and that modern slavery, human trafficking, and forced labour have no place within our operations or supply chain. This commitment extends to all employees, contractors, consultants, trainees, apprentices, volunteers, and anyone working on our behalf, whether on site, remotely, or while travelling.

Our approach covers all stages of employment and business activity, including recruitment, training, supplier engagement, and performance monitoring. We actively assess and mitigate risks related to modern slavery, ensuring ethical practices and transparency throughout our operations and partnerships.

### **Definitions**

The Organisation 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.

### **Commitment**

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

We do 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 CLEAN in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. CLEAN strictly adheres to the standards required in relation to its responsibilities under relevant employment legislation in England.

### **Supply chains**

In order to fulfil its activities, the main supply chains of CLEAN include those related to the sourcing of raw materials principally related to the procurement and processing of textiles. We understand that our first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

### **Potential exposure**

CLEAN considers its main exposure to the risk of slavery and human trafficking to exist in our supply chain, providing our raw materials of linen because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

As an importer of textile products, we are committed to ensure that our supply chain is auditable and there is no risk of slavery or human trafficking taking place. We have personally visited the mills that we directly source linen product from to ensure that this is the case. We have also audited these sites to ensure that they are free from child labour.

## **Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk:

- We process all our own products within the UK with no outsourcing or use of third parties;
- We limit the geographical scope of our sites to the UK mainland to ensure optimum control of our sites and people;
- Where possible we build long standing relationships with our suppliers and make clear our expectations of business behaviour;
- With regards to our international supply chains, we have a partnership with a UK- based company. We also audit all sites that our linen products are sourced from to ensure that we are fully compliant with the Act;
- If we use third party suppliers for products, we expect these entities to have suitable anti-slavery and human trafficking policies and processes;
- We have appropriate policies in place to encourage the reporting of any concerns from our employers and any employees raising concerns through our Whistleblowing Policy are suitably protected.

## **Impact of COVID-19**

The COVID-19 pandemic did not affect the risk of modern slavery for CLEAN to a level above that which existed before the pandemic, which is as set out under 'Potential Exposure' above.

The vast majority of our workforce were placed on furlough as a result of the drop in demand for our services, meaning there were no additional temporary labour needs.

During the pandemic, our employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

CLEAN's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

## **Steps**

CLEAN 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.

We have not, to our 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, CLEAN has taken the following steps to ensure that modern slavery is not taking place:

- reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- measures in place to identify and assess the potential risks in its supply chains;
- undertaking impact assessments of its services upon potential instances of slavery.

## **Our Employees**

All our employees are UK-based, and we are compliant with the National Living Wage requirements.

We minimise the use of agency labour and ensure compliance with all aspects of English employment law. This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

**Objectives**

- Ensure there is no child labour, forced labour or human trafficking in our own operations.
- Develop and maintain long-term partnerships with suppliers to foster continuous improvement in ethical labour practices.

**Targets for 2026**

- Zero instances of child labour found in our own operations.
- Zero instances of forced labour found in our own operations.
- Zero instances of human trafficking found in our own operations.

**Allocation of Responsibilities and Review**

This policy is reviewed annually. The CEO undertakes ultimate responsibility for the company's Occupational Health and Safety (OH&S) management system with Directors, Management and Supervisory personnel having the responsibility for implementing it throughout the company, ensuring that health, safety and welfare are considered when planning work. The success of this policy relies on the full co-operation and commitment of all personnel working with H&S as their top priority.