

Corporate and Social Responsibility Policy

bespoke takes our responsibility to act in a socially and corporately responsible manner very seriously. We have in place Corporate Governance measures, and we also go out of our way to engage with and support our local community, wherever a contract may be located. Some examples are given below:

Social Responsibility: bespoke, the local community & Suppliers including Community Investment

It is bespoke's policy to support local suppliers and service providers wherever possible; this is underlined by our retained suppliers and service providers:

- Our retained IT Support suppliers are a locally based company in Bristol.
- Our machinery suppliers and repair providers, Alpha Floor Maintenance, are a family-run firm and local to our Regional Office – again, we have developed a long-term relationship with them.
- Our uniform supplier, Safpro, is based locally in Gloucester, and is also a family-run and owned firm.
- Our chemical distributors/suppliers, Selden Chemicals, are local and have rigorous environmental, social and Health & Safety policies in place including ISO 14001, IPPC Permit and EU Ecolabel Registered & Compliant. Our chemical suppliers, Gremer Chemicals, are locally based in South Wales and are ISO 14001 certified.
- We use firms local to our Head Office wherever possible when instructing new business.



bespoke is involved in our local community, for example:

Our directors have been involved in various charity events; for example, Brian Ramsay, our operations director, undertook a cycle ride from Land's End to John O'Groats in aid of Cancer Research UK and the Alzheimer's Society.

We donated uniforms to Ladies Poultry Co-Operative at Sara Kunda, The Gambia, through the Empower charity when requested by a member of the cleaning team who is involved in supporting this organisation.

Each Summer bespoke's staff take part in a day of games and tea and cakes in aid of either Macmillan Nurses or Alzheimer's, and charity sweepstakes for the results of popular TV competitions.



Sales Director Karen Allison held a 'Lap the Lake' day at Cwmbran Boating Lake, raising funds for Age Connects Torfaen who support members of the local community affected by early onset dementia.



Head Office staff choose a different charity annually and make donations in lieu of Christmas cards/gifts to colleagues; we also have a charity raffle each year.

bespoke has been involved in collections for the SLS Charity working with homeless people in Bristol, under the auspices of Managing Director, Jackie Woodall.

We also support a Memory Café local to our Head Office.

We have been involved in various charitable projects with our clients including:

Awards – bespoke has sponsored awards at various of our college contracts, and bespoke's team were also recently recognised for their contribution too.



Responsibility in the Supply Chain:

NB please also see our Statement in relation to Modern Slavery below

We also understand the importance of social responsibility in our service providers, suppliers and sub-contractors. We have a Supply Chain Management Policy and Suppliers/Sub-Contractors Policy in place; we have also developed a Suppliers' Questionnaire, completed by all new suppliers and renewed annually for current ones, which requires information on compliance, environmental and Health & Safety issues.

bespoke is certified to ISO 9001:2015 and we follow Purchasing Control protocols as below. We evaluate and select suppliers based on their ability to supply in accordance with our requirements.

Evaluation, re-evaluation, and selection criteria for suppliers are established as follows:

- ISO 9001 Certification and/or 14001 or international equivalent



- Satisfactory trading history with the Company
- Nominated supplier by a client
- Evaluation by Director

In addition, further criteria are applied such as: recommendation; innovation; quality and range of products and services available; competitiveness; specialist suppliers if appropriate.

Responsibility to our staff:

NB please also see our Statement in relation to Modern Slavery below

bespoke believes that this is an important part of Social Responsibility. We have in place policies to ensure that not only is legislation complied with, but that staff are encouraged to develop and improve their performance during their employment:

- Equal Opportunities
- Positive Working Environment
- Personal Development
- Employee Reporting & Consultation
- Training

bespoke operates a Policy for Personal Development – a copy is available on request. All members of staff are encouraged to continue their personal and professional development through on-going training, both formal and in-house.

Incentives are given on successful completion of additional formal training in the form of High Street Gift Vouchers.

bespoke has also implemented 'Shining Star' awards (the 'bespoke OSCAR') awarded termly to members of the Cleaning Team who go above and beyond what is expected of them (please see our Facebook page for the latest awards - <https://www.facebook.com/bespokecleaningthornbury>).

bespoke's staff also take part in Client award schemes; in 2019 bespoke staff have received awards from our clients at City of Bristol College, and Coleg Gwent.

GDPR:

All bespoke employees have been trained on the GDPR legislation which came into force with effect from 2018.05.25, either at our Head Office, or via on-site Toolbox Training. All staff received a copy of bespoke's Privacy Policy and GDPR policy; this information is also available 'live' 24 hours a day on our Employee Portal.

Responsibility to our Customers: Working in Partnership

Equality: bespoke has in place a Policy Statement on Equality in Service Provision: copies available on request.

Corporate Responsibility:

bespoke Cleaning Services is a Private Limited Company with no shareholders. However, bespoke has in place in each director's Conditions of Employment, the following clause relating to director behaviour as part of its Corporate Governance systems:

- The director must not directly or indirectly seek, receive or obtain from any



customer, supplier or potential customer or supplier, in respect of any goods or services sold or purchased or business transacted (whether or not by the Director) by or on behalf of the Company any discount, rebate, commission, bribe, kickback or other inducement (whether in cash or in kind) which is not authorised by the Company.

bespoke has in place an Anti-Bribery Policy - attached below for information.

GDPR as of 25th May 2018:

bespoke has in place and implements a range of policies to ensure that we adhere to the requirements of the new General Data Protection Regulations which came into force from May 2018, including Privacy Notices in both employee and Client versions – please also see under 'Compliance' below.

GDPR policies and procedures are implemented under the auspices of bespoke's Director of Personnel, our HR Manager, and our retained professional advisors.

bespoke Statement reference the Modern Slavery Act 2015

Our Staff:

NB bespoke's turnover falls beneath the £36million threshold detailed by the Modern Slavery Act 2015, therefore we do not have a separate Policy Statement in place currently.

However, we adhere to the spirit of the legislation and all bespoke's staff are employed directly by us; we do not use agency or third-party workers. All bespoke's business is conducted in the UK and we adhere to all UK employment legislation. We have in place various Policies relating to Equality & Diversity in the workplace, staff development and retention, and corporate governance. Copy documentation is available on request.

Our Supply Chain:

bespoke has in place detailed Supply Chain Management Policies (available on request):

- Policy on Suppliers & the Use of Sub-Contractors
- Supply Chain Management Policy

We have long-term relationships with all of our sub-contractors, all of whom are small, privately owned UK businesses; none of our sub-contractors are permitted to further sub-contract our work.

No business by bespoke or our sub-contractors is undertaken outside of the UK.

In addition, bespoke has recently reviewed our Supply Chain Management Policies with a view to identifying and mitigating any areas which are not currently controlled - for example we have looked our uniform suppliers' ethical policies, and have checked where supplied cleaning products and equipment are manufactured etc. (All UK or EU).

For 2019-20 we completed a review of all supplied cleaning products and confirmed with our suppliers that no products or any elements within those products, have been tested on animals at any stage.

Code of Best Practice: Principles of Good Governance

- There will be a clear division of responsibilities at the head of the Company which will ensure a balance of power and authority.
- The company will develop a formal procedure for the fixing of Directors' Remuneration.
- The Directors will maintain a sound system of internal control to safeguard the Company's assets.
- The Directors will meet regularly.
- The Directors will bring an independent judgement to bear on issues of strategy, performance, resources and standards of conduct and will conduct regular reviews of the effectiveness of the Company's system of internal control.
- Notice periods for Directors will be set at one year or less.
- Terms and conditions as set out in the Employee Handbook, particularly as they relate to Gross Misconduct, will apply to Directors of the Company and a clause to that effect is included in the employment contract for each Director.

bespoke Company Philosophy:

- **Honesty. Integrity. Professionalism.** From all of our personnel all of the time.
- **Listening** to our clients' needs and frustrations.
- **Tailoring** an individual package of services to satisfy each client's requirements.
- **Effectively** recruiting & training our cleaning staff.
- **Quality** Contract Managers to undertake the daily management of each Contract.
- **Supporting** both the client and the on-site cleaning staff through our Area Management team.
- **Guaranteeing** that all equipment and cleaning materials are available on site.
- **Ensuring** that all cleaning personnel are paid accurately and on time.

Compliance:

bespoke Cleaning Services confirms that we comply with all legislative acts relating to employment and company practices. bespoke has retained Ellis Whittam Corporate Support as our compliance partners in these matters, also including Health & Safety. Contact details are available if required.

In addition, bespoke has in place the following policies to manage these requirements. Copies of all documents are available on request.

General & Company Practices Policies: Corporate Governance * Business Continuity Plan & Register of Risk * Data Protection & GDPR * Secure Storage of Information Policy and Confidentiality Statement * Supply Chain Management (also Environment & Health & Safety) including Statement regarding the Modern Slavery Act 2015 * Use of Suppliers & Sub-Contractors * Quality * Social Responsibility including Statement regarding the Modern Slavery Act 2015 * Child Protection & Safeguarding * Anti-Bribery * Breach of Security relating to Personal Data * GDPR – including Client Privacy Statement (see also Employment Policies below) * Criminal Finances Act * Organisation Context Document * HSEQ Register of Risk * HSEQ Register of Objectives * HSEQ Register of Compliance & Publications.

Employment Policies: Equal Opportunities * Race Relations * Policy on the Under-Representation of Ethnic & Other Groups * Employee Reporting & Consultation * Positive Working Environment * Personal Development * Training * Recruitment Practices * Vetting * CRB (Criminal Record Bureau) Disclosures – *now DBS Checks – Disclosure & Barring Service* * Training of Relief Staff * Child Protection Policy Statement * GDPR – including Policy and Privacy Statement; Data Breach Policy; Providing References Policy; Retention of Staff Records; Recruitment of Ex-Offenders; Subject Access Requested Procedure Policy etc.

Quality Policies: Quality Policy Statement * Quality Management System & Quality Assurance Policy to ISO 9001:2015 * Customer Care & Escalation * Training, Recruitment & Staff Retention * Quality Management System Change Register & Register of Risk * Company Context * Register of Needs of Interested Parties.

Environmental Policies: Environmental Policy & Principles * Sustainability Policy Statement * Environmental Management to ISO 14001:2015 * Supply Chain Management * Use of Suppliers & Sub-Contractors * WEEE 2006 * Waste Management * ESOS Compliance Statement & Report * Impacts & Mitigations * HSEQ Register of Risk * HSEQ Register of Objectives * HSEQ Register of Compliance & Publications.

Health & Safety Policies: Health & Safety * Safe System of Work to OHSAS 18001:2007 * Safe Use, Storage and Handling of Substances (COSHH) * Risk Assessments * Lone Workers * Reporting of Accidents * Reporting of Dangerous Occurrences * Infection Control & Outbreak Policy * Method Statements * HSEQ Register of Risk * HSEQ Register of Objectives * HSEQ Register of Compliance & Publications.

bespoke Statement re the Criminal Finances Act 2017

From 30 September 2017, the Criminal Finances Act 2017 will make companies and partnerships criminally liable if they fail to prevent tax evasion by either a member of their staff or an external agent, even where the business was not involved in the act or was unaware of it.

bespoke Cleaning Services confirms that we pay all our liabilities within the given deadlines, and that we have the appropriate procedures and checks in place to prevent tax evasion.

Anti-Bribery Policy

All staff are prohibited from offering, giving, soliciting, or accepting any bribe, whether cash or other form of inducement to or from any person or company in order to gain any commercial, contractual, or regulatory advantage for the Company in a way which is unethical or in order to gain any personal advantage, monetary or otherwise, for themselves or anyone connected with them.

In the course of providing services to clients, or in your dealings with suppliers, or any other person having similar connections to the Company, you should under no circumstances accept money, gifts, or other forms of reward without prior consent from a Director.

You will in no circumstances accept undue hospitality from a client or supplier. This includes entertainment, the cost of recreation or holidays etc.

Where refusal of an offer of a gift or hospitality might cause embarrassment or difficulty, the matter should be immediately referred to the Managing Director.

It is Company policy to report any gifts that you have received to your Regional Manager, and this will be recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Managing Director before proceeding.

This statement has been approved by the organisations Managing Director who will review and update it annually.



Jackie Woodall

Managing Director

Date: 01.01.2024



Anna Symes

Personnel Director

Date: 01.01.2024