



Corporate Governance

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.

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)* 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 with Covid 19 update * Method Statements * HSEQ Register of Risk * HSEQ Register of Objectives * HSEQ Register of Compliance & Publications * Covid 19 Statement * Covid Secure Certificate * Employee Contact Protocol * Safe Return to Work Risk Assessment * Covid 19 Cleaning Schedule & Method Statement

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.



Modern Slavery Act 2015

Modern Slavery Act 2015

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 at our uniform suppliers' ethical policies and have checked where supplied cleaning products and equipment are manufactured etc. (All UK or EU)

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 Director of Operations.

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 Director of Operations before proceeding.



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

Managing Director's name: Jackie Woodall

Date: 12.10.22

Signature:

A handwritten signature in blue ink that reads 'J Woodall'.

Personnel Director's name: Anna Symes

Date: 12.10.22

Signature:

A handwritten signature in black ink that reads 'ASymes'.