

Modern Slavery and Human Trafficking Policy

Introduction

bespoke Cleaning Services is a provider of cleaning and support services and is committed to prevent modern slavery and human trafficking, not only by the company and its employees, but also by anyone who is acting on our behalf.

We do this by regularly reviewing our policies and ensure that all employees receive training on modern slavery and human tracking, ensuring that there is an awareness and an understanding of the issue. Before any new supplier commences working for us, we make it clear to them our expectations and requirements around modern slavery and human trafficking, but also ensure that our existing suppliers and subcontractors comply with our requirements.

What is modern slavery and human trafficking?

Modern slavery goes beyond just bad working conditions and people trapped in slavery can face physical, verbal and sexual abuse on a daily basis. Estimates indicate there are 50 million people (worldwide) in situations of modern slavery on any given day – this is nearly 1 in every 150 people in the world.

Human trafficking is when a person is tricked or forced into a situation where they will be exploited for profit. Children, women and men around the world are trafficked into slavery including forced labour, forced marriage, domestic servitude and sexual exploitation.

In many cases people trapped in modern slavery and human trafficking cannot leave to find other work or protect their families.

Our business

Since its inception in 2002, bespoke Cleaning Services has grown to be a leading company in the cleaning and support service sector. We operate in the UK and look after a large diverse customer base from schools and colleges to offices, public sector buildings and manufacturing facilities by offering a range of services including general cleaning, specialist cleaning as well as auxiliary services.

Supply chains

bespoke Cleaning Services uses various suppliers to support its operations and service delivery, namely, to supply equipment and consumables, IT services, legal services as well as sub-contractors who undertake specialist cleaning activities. We ensure that all supply partners and sub-contractors acting on our behalf share our ethos in terms of modern slavery and human trafficking.

Policies

The company (bespoke) operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Whistleblowing policy: The company encourages all its workers, customers, and business partners to report any concerns related to the direct activities or supply chains of the company. The policy allows for disclosures to be made without fear of retaliation.
- Employee code of conduct: This makes clear to employees and workers the actions and behaviour expected of them when representing the company.
- Supplier / Procurement code of conduct: We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour.
- bespoke do not use agency staff as all staff are directly employed with each employee having their own set of 'terms & conditions' of employment.

Our supply chain

We expect our suppliers to demonstrate a zero-tolerance approach to exploitation. All suppliers are subject to our 'on boarding' approval process in accordance with our 'management of suppliers' procedures. Our subcontractor information control process is used to assess the suitability of any vendor to supply goods and services to bespoke Cleaning Services.

Our subcontractor information control process captures information (including appropriate policies) confirming that vendors who wish to supply goods or services (to bespoke) are also committed to ensuring that exploitation and human trafficking has not and will not have taken place within their own supply chain.

Our people

All our workers undergo identity and right to work checks before they commence their employment with the company. In addition to this, reference checks are also completed, identity documents are electronically verified via CREDAS, and enhanced DBS checked are carried out on all workers who work on premises where there may be children or vulnerable adults. We prohibit the confiscation of workers' original identification documents. We aim to employ all workers directly with checks in place to ensure that payment of wages is made directly to that person, normally via a 'direct bacs payment' into their bank account. We prohibit the use of worker paid recruitment fees.

Bespoke strives to ensure that we are compliant with legislative requirements and that no child labour is used, employment is freely chosen, that freedom of association is respected, and we ensure that we do not pay wages which are lower than the national minimum wage. Employees have the freedom to end their employment, working hours are not excessive and compulsory overtime is prohibited. Threats of violence, intimidation and harassment is prohibited and discrimination is not practiced. If any worker believes that have come across any instance of modern slavery or if they are a victim and need assistance or information about remedy, compensation and justice, they will be advised of their right to contact the Modern Slavery Helpline.

Employee awareness and compliance

Our employee handbook sets out the companies' policies which is made available to all our employees via their employee portal. We also provide training via 'toolbox talks' to all our employees which are uploaded to their individual portals, thereby ensuring that key messages of modern slavery and human trafficking are communicated to our workforce.

Training

We believe that raising awareness by engaging employees and sharing 'toolbox talks' and other pertinent information with our suppliers (about modern slavery and human trafficking) to be our most effective means of ensuring that there is no opportunity to hide forced labour within our organisation and other organisations within our supply chain.

The company has also raised awareness of modern slavery and human trafficking by placing posters across the organisations premises as well as uploading a series of posters onto employee's individual portals.

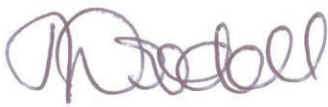
Training includes how to identify the signs of slavery and human trafficking, what initial steps to take if slavery or human trafficking is suspected, how to escalate potential slavery or human trafficking issues within the organisation as well as what external help is available.

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

Managing Directors name:

Jackie Woodall

Managing Directors signature:



Date:

January 2024