

Modern Slavery and Human Trafficking Policy

PURPOSE

CleanKing is committed to conducting business ethically, responsibly and with integrity. We recognise that modern slavery is a serious criminal offence and a violation of fundamental human rights. We are committed to preventing modern slavery and human trafficking in all areas of our business and throughout our supply chain.

This policy sets out the principles, responsibilities and controls that CleanKing has in place to identify, prevent and address the risks of modern slavery, forced labour, servitude, human trafficking and other forms of labour exploitation.

We have a zero-tolerance approach to modern slavery and expect the same high standards from everyone who works for or with us.

SCOPE

This policy applies to all persons working for or on behalf of CleanKing, including:

- Directors
- Employees
- Temporary and agency workers
- Contractors
- Consultants
- Apprentices
- Volunteers
- Subcontractors
- Recruitment agencies
- Suppliers
- Service providers
- Business partners

The requirements of this policy apply to all business activities undertaken by CleanKing, regardless of location.

POLICY STATEMENT

CleanKing is committed to:

- Complying with the Modern Slavery Act 2015 and all other applicable employment and human rights legislation.



- Preventing modern slavery and human trafficking within our own operations and supply chain.
- Ensuring all employment is freely chosen.
- Treating all workers with dignity, fairness and respect.
- Providing safe and healthy working conditions.
- Paying employees fairly and in accordance with applicable legislation.
- Carrying out appropriate due diligence on suppliers and subcontractors.
- Encouraging anyone with concerns to report them without fear of retaliation.
- Taking immediate action where breaches of this policy are identified.

CleanKing will not knowingly engage with organisations that participate in or facilitate modern slavery.

DEFINITIONS

For the purposes of this policy, modern slavery includes, but is not limited to:

- Human trafficking
- Slavery
- Servitude
- Forced or compulsory labour
- Debt bondage
- Child labour prohibited by law
- Any exploitation where individuals are controlled through coercion, threats, deception or abuse of vulnerability.

ROLE AND RESPONSIBILITIES

Chief Executive Officer

The Chief Executive Officer has overall responsibility for ensuring this policy is effectively implemented and remains compliant with current legislation.

Responsibilities include:

- Promoting an ethical business culture.
- Approving this policy and reviewing it annually.
- Ensuring appropriate resources are available.
- Monitoring organisational compliance.
- Supporting continual improvement.

Senior Management

Senior Managers are responsible for:

- Implementing this policy within their areas of responsibility.
- Identifying and managing risks.
- Ensuring employees understand their responsibilities.
- Supporting investigations.
- Monitoring supplier performance where appropriate.

Procurement and Contract Managers

Employees responsible for supplier selection or procurement must:

- Assess supplier risk before engagement.
- Complete supplier due diligence.
- Include appropriate contractual requirements.
- Monitor supplier performance.
- Escalate any concerns immediately.

Employees

All employees are expected to:

- Read and comply with this policy.
- Remain vigilant for signs of modern slavery.
- Report any concerns promptly.
- Participate in mandatory awareness training.
- Cooperate fully with investigations.

Failure to comply with this policy may result in disciplinary action.

RISK ASSESSMENT

CleanKing adopts a risk-based approach to identifying modern slavery risks within our operations and supply chain.

Risk assessments may consider:

- Country of operation
- Industry sector
- Labour-intensive activities
- Use of temporary or agency labour
- Reliance on subcontractors
- Previous supplier performance
- Publicly available information

- Complexity of supply chains

Risk assessments are reviewed periodically and whenever significant operational changes occur.

DUE DILIGENCE

CleanKing undertakes appropriate due diligence before entering into business relationships and throughout the duration of supplier contracts.

Due diligence may include:

- Supplier pre-qualification questionnaires
- Review of Modern Slavery Statements
- Ethical trading policies
- Supplier declarations
- Site visits where appropriate
- Independent audits
- Review of public records
- Review of enforcement notices or legal actions
- Assessment of labour practices

Enhanced due diligence may be undertaken where suppliers operate within higher-risk sectors or geographical regions.

SUPPLIER EXPECTATIONS

CleanKing expects suppliers, subcontractors and labour providers to:

- Operate in accordance with all applicable employment legislation.
- Prohibit forced labour and human trafficking.
- Ensure employment is freely chosen.
- Pay lawful wages.
- Maintain safe working conditions.
- Respect workers' rights.
- Maintain accurate employment records.
- Cooperate with reasonable requests for information.
- Notify CleanKing immediately if any modern slavery concerns arise.

Failure to meet these standards may result in corrective action, suspension or termination of contracts.



RECRUITMENT PRACTICES

CleanKing is committed to ethical recruitment.

We will:

- Verify identity and right to work.
- Ensure employment contracts are provided.
- Use reputable recruitment agencies.
- Never require employees to pay recruitment fees.
- Ensure workers retain control of their personal identification documents.
- Comply fully with UK employment legislation.

TRAINING AND AWARENESS

CleanKing provides appropriate training to employees whose roles may expose them to modern slavery risks.

Training includes:

- Understanding modern slavery.
- Recognising warning signs.
- Reporting procedures.
- Supplier responsibilities.
- Procurement controls.
- Legal obligations.

Training records are maintained as evidence of compliance.

REPORTING CONCERNS

CleanKing encourages all employees, suppliers and other stakeholders to report concerns regarding suspected modern slavery.

Concerns may be raised through:

- A Line Manager
- Human Resources
- Senior Management
- The Company's Whistleblowing Policy
- Confidential reporting channels

All concerns will be investigated promptly, fairly and confidentially wherever possible.

Individuals raising concerns in good faith will be protected from victimisation or retaliation.

INVESTIGATION AND CORRECTIVE ACTION

Where concerns are substantiated, CleanKing will:

- Investigate promptly.
- Take appropriate disciplinary action where necessary.
- Work with suppliers to implement corrective actions.
- Suspend or terminate supplier relationships where required.
- Notify relevant authorities where appropriate.
- Review internal controls to prevent recurrence.

MONITORING AND CONTINUOUS IMPROVEMENT

CleanKing monitors the effectiveness of this policy through:

- Internal audits
- Supplier reviews
- Management review meetings
- Risk assessments
- Training completion records
- Corrective action monitoring
- Whistleblowing reports
- Annual policy reviews

Key performance indicators may include:

- Percentage of suppliers assessed.
- High-risk suppliers reviewed.
- Employee training completion.
- Supplier corrective actions completed.
- Reported concerns investigated.

Findings are reviewed by Senior Management to support continual improvement.

RELATED POLICIES

This policy should be read alongside:

- Code of Business Conduct
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Equality, Diversity and Inclusion Policy
- Recruitment and Selection Policy
- Supplier Code of Conduct
- Procurement Policy

- Health and Safety Policy

COMPLIANCE

Failure by employees to comply with this policy may result in disciplinary action, up to and including dismissal.

Failure by suppliers, contractors or subcontractors to comply may result in suspension or termination of contracts and, where appropriate, notification to the relevant authorities.

REVIEW

This policy will be reviewed annually or sooner where there are:

- Changes to legislation
- Organisational changes
- Significant incidents
- Audit findings
- Emerging risks
- Best practice developments

Approval

This policy has been approved by the Chief Executive Officer and is effective from the date shown below.

Approved by:

John Varitsas

Chief Executive Officer

Approval Date: 4 August 2026

Next Review Date: 4 August 2027