



# SLAVERY & HUMAN TRAFFICKING POLICY

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## INTRODUCTION

Slavery and human trafficking is an affront to liberty and it is the responsibility of all to be vigilant and aware of the risks in our business and in our supply chain. Staff are expected to report suspicions of slavery and human trafficking. Which the company will act upon.

## CHAMBERLAINE CLEANING SERVICE LTD BACKGROUND

“Chamberlaine” have been offering high quality commercial cleaning and support services to commercial properties in London for over 25 years. As a successful company we are able to mix the highest levels of professionalism with a personal touch not seen elsewhere. We have exclusive partnerships with industry leading suppliers who work along with us searching, developing and producing unique innovations, systems, products and services that meet the needs and requirements of our clients, planet and society as a whole.

This all-inclusive service requires dedicated professional collaborating in large relations and an active supply chain at a national and international level. Please see <https://www.chamberlaine.co.uk/> to learn more about Chamberlaine Cleaning Services Ltd.

## STEPS WE TAKE WITHIN CHAMBERLAINE TO ADDRESS MODERN SLAVERY

The Modern Slavery Act 2015 has prompted us to review where our business and supply chain are most at risk of encountering modern slavery. We have considered our existing controls and processes and their effectiveness in guarding against modern slavery in our own operations.

Chamberlaine personnel are required to abide by the *“Ten Principles of the UN Global Compact”* our internal code of ethics, internal professional development and the UN principles underpin the importance of maintaining a responsible conduct and a responsible supply chain and not tolerating illegal or unethical behaviour by our employees, suppliers or contractors. These are non-negotiable elements of our professional environment. Chamberlaine’s Ethics include a robust cloud-based training portal and internal training material and guidance for employees enable them to assemble their decision making consistent with the global principles and Chamberlaine’s code of ethics.

In addition to the above

We have a number of actions implemented, those including but not limited to:

- An Anti-Slavery Policy has been put in place.
- The company continues to conduct ‘right to work’ in the UK checks on employees.
- Good communication is in place on this issue between our supply chain and us.
- Supportive Policies and Procedures are in place.

Employees are empowered to interact in a way that brings value, improve their relationship, their professional and personal moral as well as enhancing the company culture, these values are:

- Lead the way
- Serve with integrity
- Foster inclusion
- Respect for each other

Chamberlaine actively encourages employees to report any issues or concerns in relation to potential ethics violations through our HR dept, our employee manual guarantees that all reports and issues are confidentially and independently managed

## IDENTIFYING THE OVERALL RISKS OF SLAVERY (MAPPING SUPPLY CHAIN)

Trafficking is difficult to disentangle from broader migration statistics, collecting and analysing spatial data allowed Chamberlaine to map the geographies of trafficking in a resourceful manner. In addition, quantitative analysis of geographies of trafficking have valuable potential in identifying and examining patterns and trends and the inter-relations between socio-economic and geopolitical conditions such as (migratory flows, labour market conditions, etc.) Such analysis allows for more advance understanding of trafficking at a local and national level as well as to have targeted responses and increasing accountability.

We based our analysis and evaluations on the latest E.U and UK reports, publications and investigations studies.

The 2022 UK study by the University College London (UCL), Department of Security and Crime Science, United Kingdom - “Examining The Geographies of Human Trafficking” founded by the UK Economic and social Research Council and supported by the UK National Crime Agency NCA - explores different aspects of trafficking’s spatiality and geography in a quantitative level in the UK.

From the study the media age was 32.1 years but the overall range was, from a few month-old baby used for benefit fraud to an 84-year old subject to fraud and theft. Only eleven nationalities future with most victims 94% coming from new EU members states. In central and Easter Europe, around two thirds spoke no English which exacerbated their vulnerability.

Variable	Frequency	Percentage
<b>Gender</b>		
Male	363	81%
Female	87	19%
<b>Age group at referral</b>		
Adult	427	95%
Child	23	5%
<b>Nationality</b>		
Polish	107	24%
Lithuanian	88	20%
Slovak	61	14%
Hungarian	55	12%
Romanian	45	10%
Czech	29	6%
Latvian	29	6%
British	27	6%
Bulgarian	7	2%
Portuguese	1	<1%
Irish	1	<1%
<b>Type of trafficking</b>		
International	385	86%
Domestic only	55	12%
Unknown	10	2%
<b>Pathways out of trafficking</b>		
Escaped of own accord	278	62%
Rescued by authorities	115	26%
Thrown out by offenders	21	5%
Combination of the above	9	2%
Other	8	2%
Unknown	19	4%

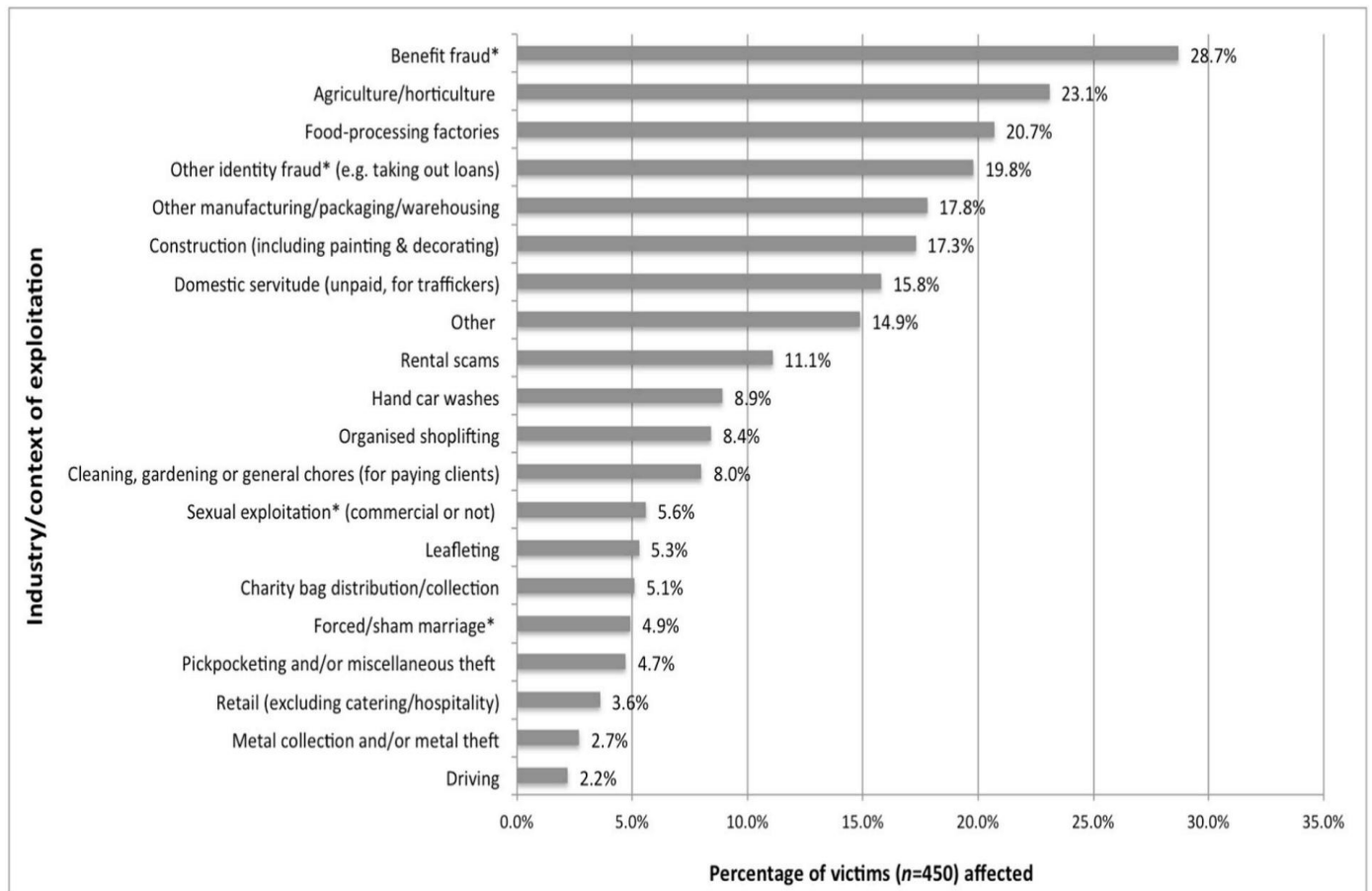


Fig. 1. Industries and other contexts of exploitation by prevalence<sup>16</sup>.

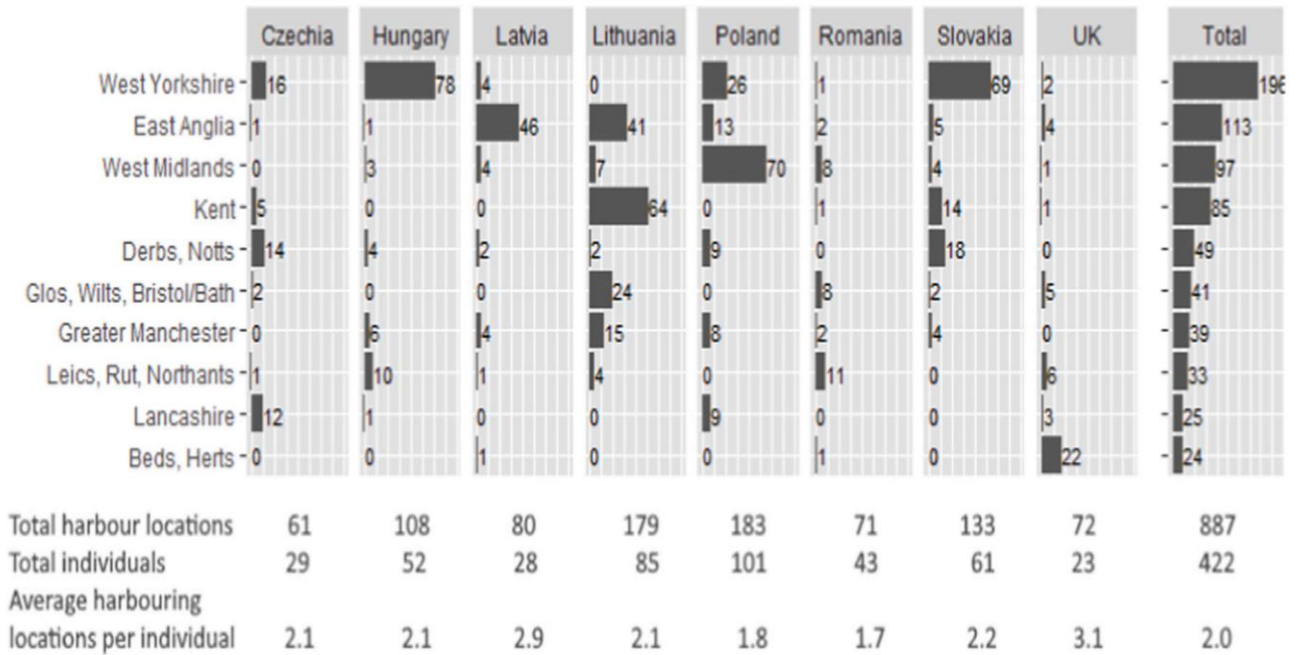
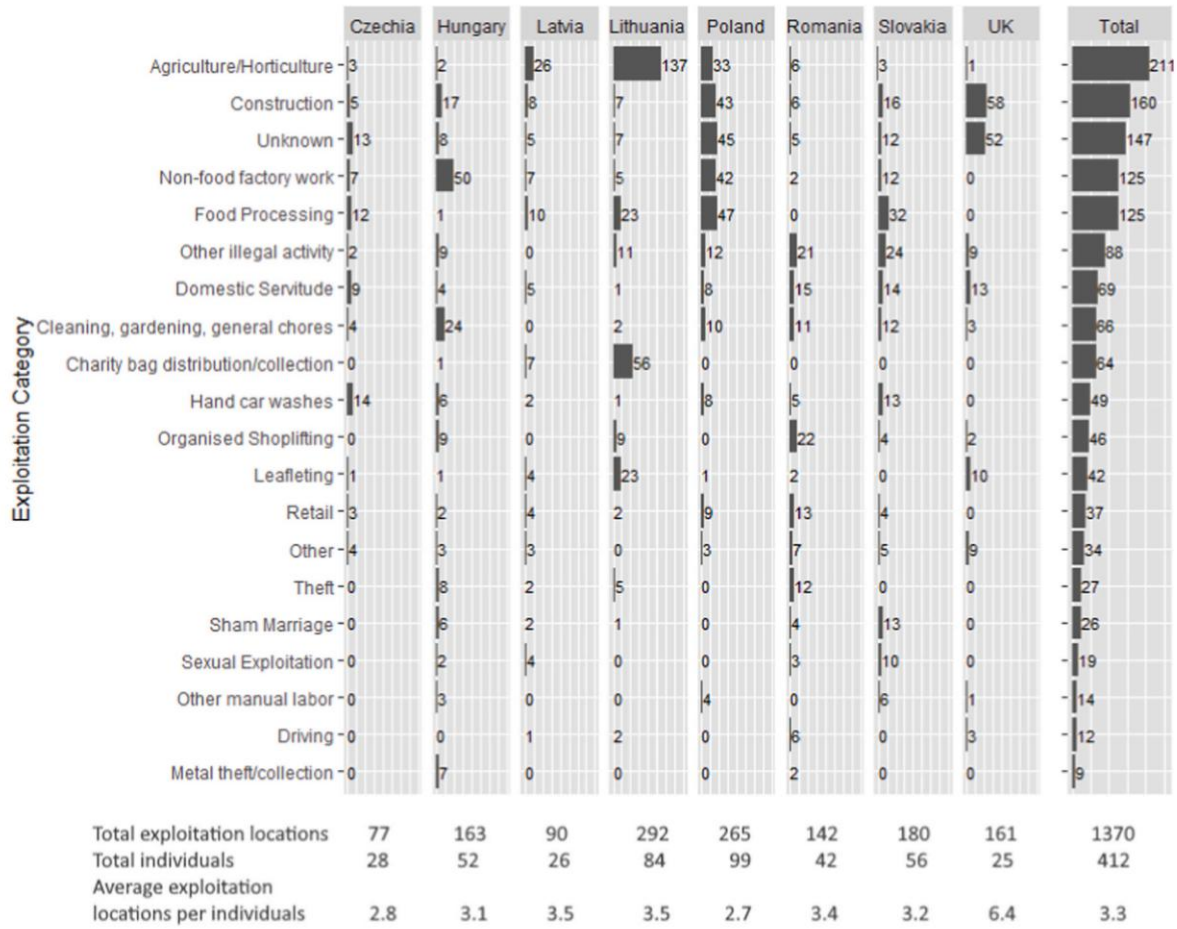


Fig. 5. Ten most common regions of harbouring locations (at NUTS2 resolution) by victims' country of birth (n = 887<sup>24</sup>).

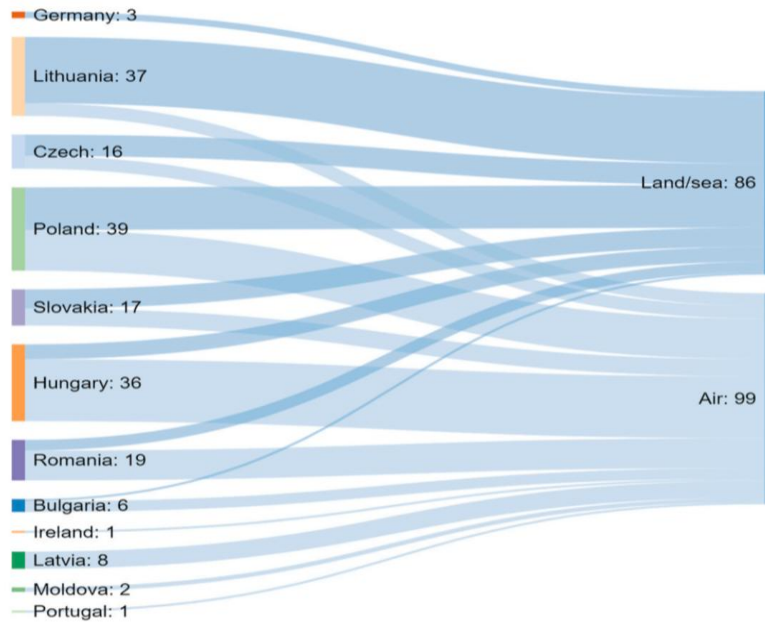


Fig. 8. The relationship between country of recruitment and mode of transport to the UK (n = 185).

## IDENTIFYING THE OVERALL RISK OF SLAVERY AND HUMAN RIGHTS VIOLATIONS OUTSIDE E.U (MAPPING SUPPLY CHAIN)

We expect our suppliers and other business partners to have the same high standards as we impose on our own business. We actively promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain. As part of our on-boarding process, our suppliers are required to read and acknowledge our Policies and guidance on Modern Slavery and Human Trafficking.

As part of our compliance processes, we assess our supply chain for potential areas of increased risk. Once areas are identified the criteria for assessing potential risk within our supply chain are

- Operations outside of the EU regulatory frameworks
- Companies that operate using temporary low skilled labour
- Manufacturing or trading in raw materials produced in non EU areas

### SPECIFIC MODERN SLAVERY RISK-ASSESSMENT TRAINING

We have incorporated modern slavery risk assessment into our service process, In addition we have compiled additional specific training, communication and awareness to offer information on ethics and human rights, this makes our program in modern slavery emerging, evolving and dynamic.

Regional rank	Country	Estimated prevalence (victims per 1,000 population)	Estimated absolute number of victims	Population
14	Malaysia	6.9	212,000	30,723,000
15	India	6.1	7,989,000	1,309,054,000
16	Nepal	6.0	171,000	28,656,000
17	Indonesia	4.7	1,220,000	258,162,000
18	Viet Nam	4.5	421,000	93,572,000
19	Bangladesh	3.7	592,000	161,201,000
20	Singapore*	3.4	19,000	5,535,000
21	China*	2.8	3,864,000	1,397,029,000
22	Sri Lanka	2.1	44,000	20,714,000
23	Korea, Republic of (South Korea)*	1.9	99,000	50,594,000
24	Hong Kong, China*	1.4	10,000	7,246,000
25	Australia	0.6	15,000	23,800,000
26	New Zealand	0.6	3,000	4,615,000
27	Taiwan, China*	0.5	12,000	23,486,000
28	Japan*	0.3	37,000	127,975,000

\*Substantial gaps in data exist for the Central and East Asia subregions where, with the exception of Mongolia, surveys cannot be conducted for reasons such as (i) survey is only delivered face-to-face, (ii) survey is delivered only in the main language which many migrant workers do not speak, or (iii) national authorities would not, or were unlikely to, consent to the module on modern slavery. Unlike several countries in Western Europe where no surveys were conducted, none of the countries in these subregions were identified as sites of exploitation by respondents in the 48 countries where surveys were implemented

Human Rights and Labour Standards is paramount to Chamberlaine ESG, within our Supply Chain human capital and its management is assessed through the analysis for huma violations, as well as evolution of

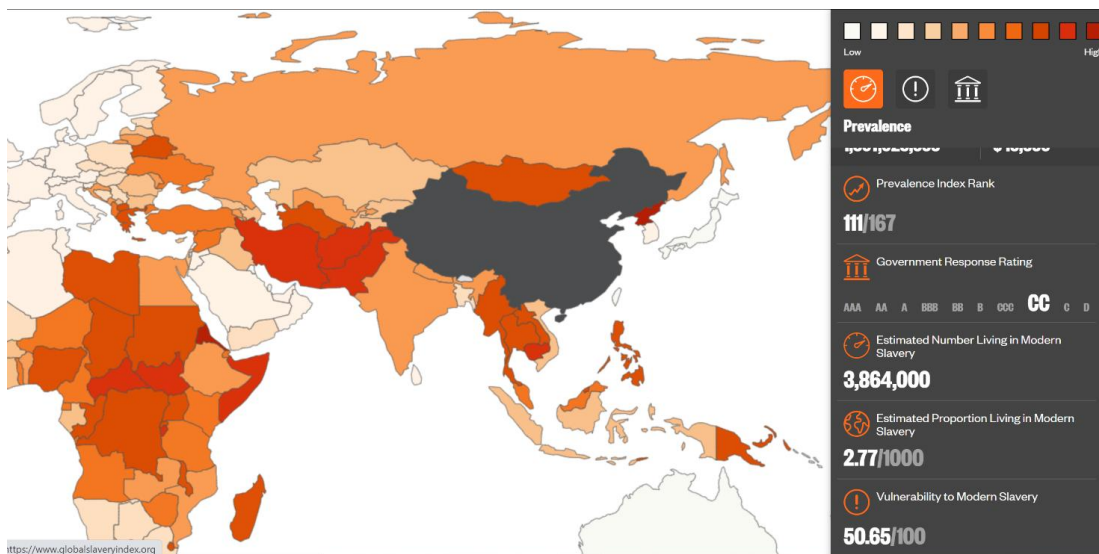
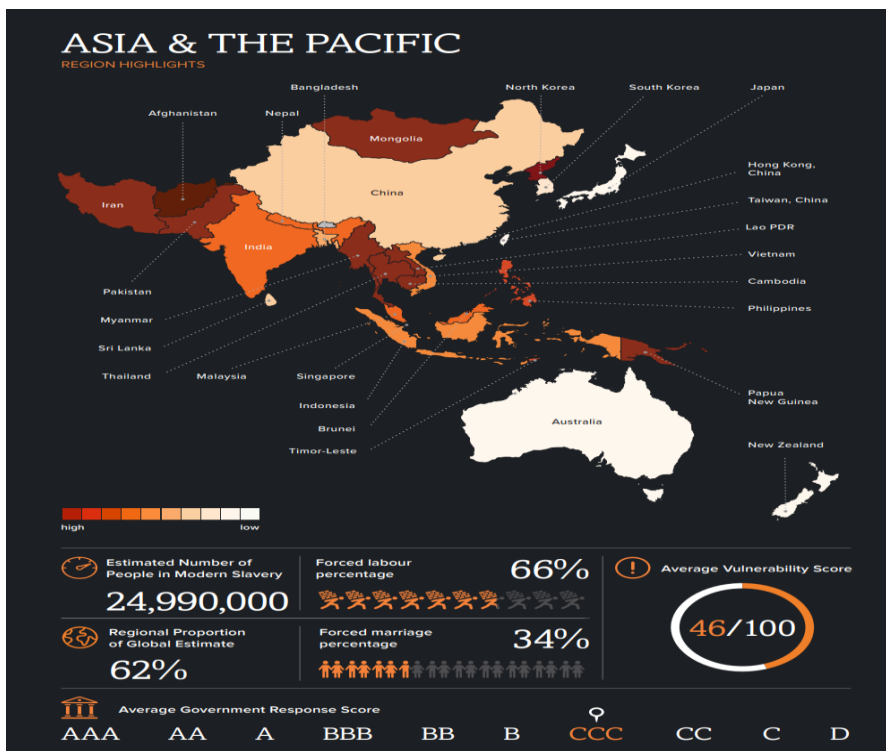




employee treatment, we look at labour related benefits in their countries, development of their infrastructure, labour related incidents, and other factors. For this we use the **Global Slavery Index** and **ILO International Labour Organization**.

- ✓ <https://www.globalslaveryindex.org/2018/data/maps/#prevalence>
- ✓ <https://www.college.police.uk/app/major-investigation-and-public-protection/modern-slavery/list-anti-slavery-charities-and-non-governmental-organisations>

All Chamberlaine investment start with an assessment of the supplier or producer alignment with the delivery of positive environmental and social impacts. This considers both materiality and measurability on social impact.



## ELIMINATION OF CHILD LABOUR

### INTRODUCTION

Chamberlaine Cleaning Services recognizes the disturbing fact that child labour and forced labour remain significant problems in many parts of the world. Our concepts for action on these issues are based on the International Labour Organization (ILO) convention and national laws, It reaffirms the need of Chamberlaine Cleaning Services to endorse appropriate initiatives to progressively eliminate these abuses.

### POLICY STATEMENT

Children should be in school, not at work. No child should be deprived of a childhood, safety, health or education. Child labour has no place in our society, and companies have a duty to stop child labour. It is time to accelerate the pace of progress and for business to take practical actions to help eliminate child labour for good.

Chamberlaine Cleaning Services does not employ any person below the age of eighteen years at the workplace. Chamberlaine Cleaning Services prohibits the use of child labour, forced or compulsory labour at all times. No employee is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work.

### IMPLEMENTATION

The policy is available throughout the Company and clearly communicated to all employees in a manner in which it can be understood. Training and information regarding Child and forced labour is done through E-Learning Platform training programmes and communication & Awareness notifications. The implementation of the policy is the responsibility of the Company's Managing Director who does not permit minors to enter the workplace as workers. There is zero tolerance policy towards its breach. Employment contracts and other documented information, detailing all relevant details of the employees, including age, are maintained at Chamberlaine Head Office and are open to verification by any authorised personnel or relevant statutory body.

We communicate this policy to our direct suppliers, partners, and we believe that promoting fair and appropriate employment at Chamberlaine and within our supply chains is a critical part of the commitments we make to our people and local communities.

### CHAMBERLAINE'S SUPPLIERS

Chamberlaine Cleaning services will not tolerate the use of unlawful child labour or forced labour in the manufacture of products we use and will not accept products or services from suppliers, subcontractors or business partners that employ or utilize child labour or forced labour in any manner.

### END CHILD LABOUR BY 2025 – ALLIANCE 8.7



In 2015 world leaders adopted the 2030 sustainable development goals 17 interrelated goals and 169 targets to guide global development, “**TARGET 8.7**” take immediate and effective measures to eradicate forced labour end modern slavery and human trafficking, and by 2025 end child labour in all its forms.



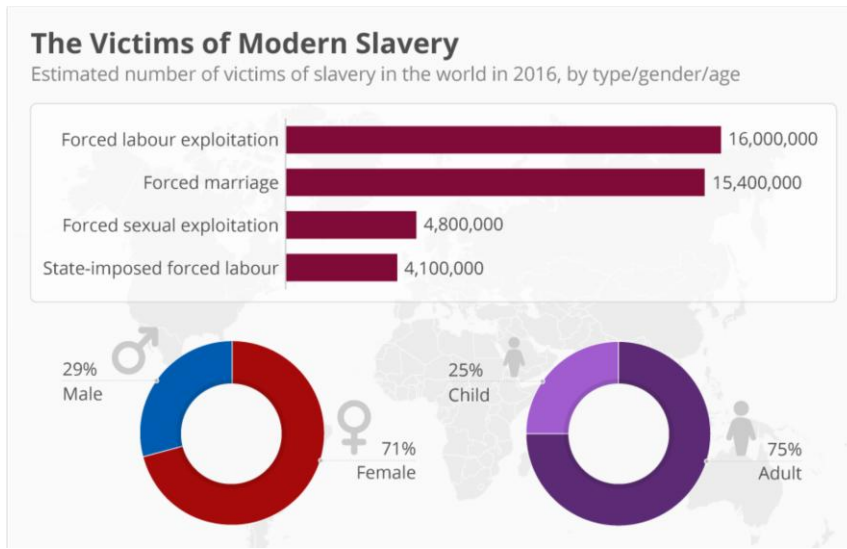


**Alliance 8.7** is a global strategic partnership created to help achieve this ambitious undertaking, critical to their mission is informing worldwide policy with up-to-date, robust data.

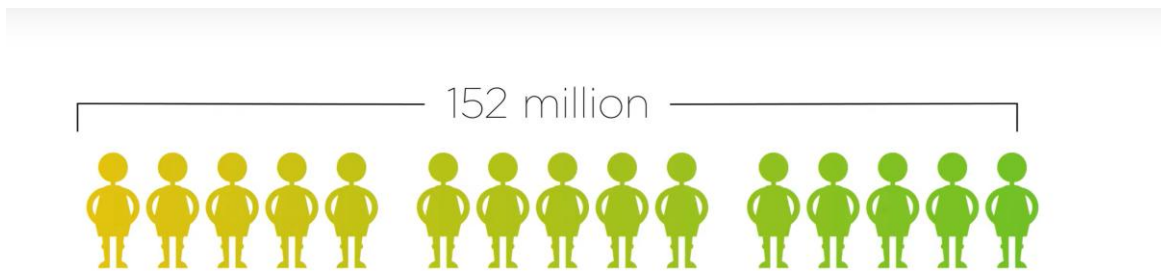
Chamberlaine recognise Children as one of the main stakeholders of our business and as such we need to maximised our positive contribution and minimised negative impacts on children, our actions and steps are aligned with U.N standards and principles such as **TARGET8.7** and **Children’s Rights and Business Principles**

<https://www.alliance87.org/pathfinder-countries/>

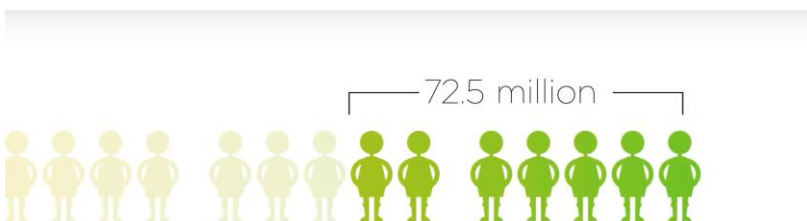
In 2016 approximately 40 million men, woman and children from every part of the globe were victims of modern slavery. There are more females than males in modern slavery.



It is by looking at the best available data that we can begin to understand modern slavery.

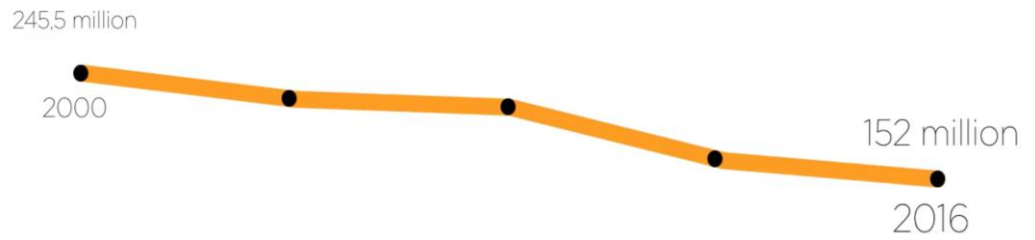


152 million children around the world are involve in child labour. From this number 72.5 millions children are involve in hazardous work, which put them in risk of health, safety and or moral development. This is one of the worst forms of child labour





The number of children in child labour dropped by 16.3 million between 2012 and 2016. This shows that we are moving in the right direction, **but** at a very slow pace



## ACTIONS AND MAPPING CHILD LABOUR

**ALL BUSINESS SHOULD** →→→

- 1 Meet their responsibility to respect children's rights and commit to supporting the human rights of children
- 2 Contribute to the elimination of **child labour**, including in all business activities and business relationships
- 3 Provide decent work for **young workers, parents and caregivers**
- 4 Ensure the **protection and safety of children** in all business activities and facilities
- 5 Ensure that **products and services** are safe, and seek to support children's rights through them
- 6 Use **marketing and advertising** that respect and support children's rights
- 7 Respect and support children's rights in relation to the **environment and to land** acquisition and use
- 8 Respect and support children's rights in **security arrangements**
- 9 Help protect children affected by **emergencies**
- 10 Reinforce **community and government efforts** to protect and fulfil children's rights

As a company Chamberlaine Cleaning Service use the **“Children’s Rights and Business Principles”** developed by UNICEF, the U.N global compact and Save the Children to guide the company principles on a full range of actions within the market place and community. We use this principles to avoid infringement of any human rights on children as well as guide our organisation in addressing any adverse human right impacts which may affect our supply chain and business. As we are fully aware that the corporate responsibility to respect applies to our business own activities, and the relationships linked to its operations, products and services

In addition we use the **alliance 8.7 “Pathfinder Countries”** to map child labour around the world Pathfinder countries go further and faster to achieve Target 8.7. They accelerate efforts, try new approaches and collaborate with others.

Pathfinder countries turn their commitments into action. They can pick up the pace in their own country and/or support other countries to accelerate action. At a national level, they convene strategic planning workshops on Target 8.7 to explore opportunities for collaboration and define national priorities.

## MONITORING AND AUDIT

Periodic assessment is conducted annually through random checks of documented information.

## REVIEW

Following its initial adoption, this policy will be reviewed by the Managing Director on a regular basis (at least annually) and may be amended from time to time or as necessary.

**Terry Sullivan**  
CEO