



SLAVERY & HUMAN TRAFFICKING POLICY

CHAMBERLAIN CLEANING SERVICES LTD
TERRY SULLIVAN



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INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Chamberlaine Cleaning Services Ltd to prevent modern slavery and human trafficking in its business operations and supply chains.

Modern slavery and human trafficking are serious violations of fundamental human rights. Chamberlaine Cleaning Services Ltd has a zero-tolerance approach to slavery, servitude, forced or compulsory labour, and human trafficking.

We are committed to acting ethically and with integrity in all business relationships and to implementing effective systems and controls to ensure modern slavery does not take place within our business or supply chains.

CHAMBERLAINE CLEANING SERVICE LTD BACKGROUND

Chamberlaine Cleaning Services Ltd provides commercial cleaning and support services to commercial properties within London. The Company operates through an active supply chain which includes cleaning product manufacturers, equipment suppliers, logistics providers, and service partners operating both within and outside the UK and EU.

OUR POLICIES

Chamberlaine Cleaning Services Ltd has implemented the following policies which underpin our commitment to preventing modern slavery:

- Slavery & Human Trafficking Policy
- Code of Ethics and Conduct
- Recruitment Policy
- Whistleblowing Policy (*within Employee Handbook*)
- Supplier Code of Conduct

These policies reflect our commitment to acting ethically and responsibly and are communicated to employees and relevant business partners.

DUE DILIGENCE PROCESSES

As part of our approach to managing modern slavery risks, we undertake due diligence across our operations and supply chain, including:

- Conducting UK Right to Work checks for all employees prior to employment
- Assessing suppliers during onboarding to confirm compliance with applicable labour and human rights legislation
- Requiring suppliers to acknowledge and comply with our Modern Slavery & Human Trafficking Policy
- Reserving the right to request supporting documentation or conduct audits where higher risks are identified

Where concerns are identified, appropriate corrective action is taken, which may include enhanced monitoring, remediation plans, or termination of the supplier relationship.

RISK ASSESSMENT AND MANAGEMENT

Chamberlaine Cleaning Services Ltd recognises that the risk of modern slavery varies by sector, geography, and labour practices. We periodically assess our supply chain to identify higher-risk areas, which may include:

- Suppliers operating outside UK or EU regulatory frameworks
- Use of temporary, agency, or low-skilled labour
- Manufacturing or sourcing of raw materials in higher-risk regions



Risk assessments are informed by recognised external sources, including the Global Slavery Index and guidance from the International Labour Organization (ILO).

TRAINING AND AWARENESS

To ensure a high level of understanding of modern slavery risks, Chamberlaine Cleaning Services Ltd provides training and guidance to relevant employees through internal training platforms and communications. Training focuses on:

- Understanding modern slavery and human trafficking
- Recognising warning signs and risk indicators
- Reporting concerns safely and confidentially

REPORTING CONCERNS

Employees, contractors, and suppliers are encouraged to report any concerns relating to modern slavery or unethical labour practices. Reports can be made confidentially through the HR Department or via the Company's whistleblowing procedures. All reports are taken seriously and investigated appropriately, with protection provided to individuals who raise concerns in good faith.

EFFECTIVENESS AND MONITORING

We monitor the effectiveness of our approach through:

- Annual policy reviews
- Supplier engagement and assessment
- Internal compliance checks

Our ongoing objective is to strengthen transparency, improve supplier engagement, and continuously reduce the risk of modern slavery within our operations and supply chains.

CHILD LABOUR

Chamberlaine Cleaning Services Ltd strictly prohibits the use of child labour, forced labour, or compulsory labour in any form. The Company does not employ any person under the age of 18 and expects all suppliers and business partners to adhere to the same standards. Non-compliance may result in termination of contracts.

APPROVAL AND REVIEW

This statement has been approved by the CEO of Chamberlaine Cleaning Services Ltd and is reviewed annually to ensure continued compliance with the Modern Slavery Act 2015 and best practice guidance.

Terry Sullivan
CEO