



SERVICE  
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# Modern Slavery Policy

Issue 1 – September 2024

## 1. Introduction

At Industrial Cleaning Equipment LTD, we are committed to preventing modern slavery and human trafficking within our operations and supply chains. This policy outlines our approach to ensuring that modern slavery is not present in any part of our business, in accordance with UK and EU laws.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## 2. Scope

This policy applies to all employees of Industrial Cleaning Equipment LTD, and all persons working on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## 3. Responsibility for the Policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Head of HR has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, providing training and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

All levels of management are responsible for ensuring that their teams are aware of, understand, and comply with this policy. Leadership is expected to foster an environment where compliance is the norm and ethical concerns are taken seriously.

We welcome and encourage feedback on this policy, including suggestions for its improvement. Any comments, suggestions, or queries should be directed to the Head of HR.



## 4. Our Organisation and Supply Chains

### 4.1. Organisation Overview

Industrial Cleaning Equipment LTD operates in the UK, specialising in the supply and servicing of industrial cleaning equipment. We are committed to ethical business practices and ensuring that our operations and supply chains are free from modern slavery.

### 4.2. Supply Chains

Our supply chains include manufacturers of industrial cleaning machines and parts in the EU and in China. We recognise that the risk of modern slavery may be higher in certain parts of our supply chains, particularly in regions outside the EU, and within hazardous working conditions.

## 5. Risk Areas

We have identified the following areas as having a higher risk of modern slavery:

- Global Suppliers based outside of Europe may not be subject to the same legal requirements as those within the UK and Europe. We provide these suppliers with our policy and conduct annual visits to check working conditions to mitigate risks.
- Hazardous Work including but not limited to using dangerous equipment, manual handling, transportation of heavy loads and manufacturing of industrial equipment. These activities carry higher risks for exploitation and unsafe working conditions.

## 6. Policy Prohibitions

### 6.1. Freedom of Workers

- All workers must have the freedom to terminate their employment with reasonable notice, in accordance with their employment contracts and local laws.
- Workers must be free to move freely and not be subject to restrictions that prevent them from leaving their employment.

### 6.2. Freedom of Association

- Workers must have the right to freely join trade unions or other worker organisations and to participate in collective bargaining.

### 6.3. Prohibited Practices

Industrial Cleaning Equipment LTD strictly prohibits the use of threats, violence, harassment, or intimidation against any worker.

- Compulsory overtime is not permitted.
- Child labour is strictly prohibited. We ensure that all workers meet the legal minimum age requirements.
- Discrimination based on race, gender, religion, disability, or other protected characteristics is not tolerated.
- The confiscation of original identification documents or personal belongings is prohibited.



## 7. Training and Awareness

All relevant employees will receive training on modern slavery to ensure they understand:

- What constitutes modern slavery and human trafficking.
- How to identify signs of modern slavery.
- Procedures for reporting concerns or suspected cases.

Training will be provided upon hiring and through periodic refreshers.

## 8. Compliance with Laws

We are committed to adhering to all applicable local, UK, and European laws regarding modern slavery and human trafficking. We continuously review and update our practices to ensure compliance with these regulations.

## 9. Reporting and Monitoring

Employees and stakeholders are encouraged to report any concerns or suspicions of modern slavery to Senior Management or HR. All reports will be investigated promptly and confidentially.

## 10. Compliance with the Policy

All employees and individuals working on our behalf are responsible for understanding and adhering to this policy. Preventing, detecting, and reporting modern slavery is a collective responsibility. We expect everyone to avoid any activity that could indicate a breach of this policy.

If you suspect or become aware of any issues that may conflict with this policy, report them to your manager or the HR Manager as soon as possible. We encourage early reporting of any concerns, suspicions, or indicators of modern slavery.

Reports will be handled in accordance with our Whistleblowing Policy. If you are unsure whether a situation constitutes modern slavery, consult with your manager or the Head of HR.

We are committed to fostering an open environment and will support anyone who raises genuine concerns in good faith, even if those concerns turn out to be mistaken. Retaliation against anyone who reports suspicions in good faith will not be tolerated. If you experience retaliation, report it to the Head of HR immediately. Use the Grievance Procedure outlined in the Employee Handbook if necessary.

## 11. Breaches of this Policy

Employees or those working on our behalf found to be in breach of this policy will be subject to disciplinary action, which may include termination of employment for misconduct or gross misconduct. We reserve the right to terminate our relationship with any individual or organisation working on our behalf if they breach this policy.

## 12. Review

This policy will be reviewed annually and updated as necessary to reflect changes in legislation or company practices.