

# Spotless

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## Anti-Slavery and Human Trafficking Policy

Modern slavery is a crime that can go undetected and in some cases the victim themselves is unaware that their liberty is being exploited. The crime takes various forms such as slavery, servitude, forced and compulsory labour, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Spotless Cleaning must try to detect any examples of such crimes and address it immediately. The scope of this policy includes all suppliers to the business.

All employees of the business at all levels, must be privy to this policy and have the awareness to alert senior management if they are suspicious of any circumstances pertaining to employees of the company or its suppliers. A non-exhaustive list of indicators to help detection of modern slavery is detailed below, but whatever the circumstances, employees should always alert senior management immediately if they are unsure about the treatment of any individual:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- The person allows others to speak for them when spoken to directly.
- The person is dropped off and collected from work.
- The person is withdrawn or appears frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside of their immediate environment.

All employees and suppliers must comply with this policy.

Any individual who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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