

MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to Bulloughs Cleaning Services Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the company financial year 1st September 2023 to 31st August 2024.

B) ORGANISATIONAL STRUCTURE

Bulloughs Cleaning Services Ltd. is a private limited company that was formed in 1967. The organisation provides cleaning services on both a regular contractual and a one-off basis for clients within the United Kingdom only. The administration of the company, including payroll is operated from our Skipton (North Yorkshire) Head Office where our Board of Directors are based who control the organisation. We employ trained Area Contract Managers in defined geographical territories to manage the cleaning contracts on client sites.

Bulloughs Cleaning Services Ltd. have both a daily contract cleaning business, where staff are managed by management teams based in the locality of the contracts themselves and an Industrial and window cleaning division , who operate exclusively from our Skipton Head Office.

The demand for our cleaning services is consistently high throughout the year and is therefore not seasonal at all in nature. The clear majority of our business (96%) is made up of long term (usually 3 to 5 year) contracts predominantly within the educational sector.

Our workforce are employed locally to the work locations themselves which is wholly within the United Kingdom. Employees are associated specifically with the contracted sites and are not moved in teams between sites or areas.

C) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.

- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

Bulloughs Cleaning Services Ltd. acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Bulloughs Cleaning Services Ltd. understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Bulloughs Cleaning Services Ltd. does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Bulloughs Cleaning Services Ltd. in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.

E) SUPPLY CHAINS

In order to fulfil its activities, Bulloughs Cleaning Services Ltd. main supply chains include those related to the supply of cleaning chemicals, cleaning equipment and cleaning machinery from our approved suppliers in both the United Kingdom and Europe. We understand that some of Bulloughs Cleaning Services Ltd. first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

F) POTENTIAL EXPOSURE

Bulloughs Cleaning Services Ltd. considers its primary exposure to the risk of slavery and human trafficking to exist within our uniform supply chains because they involve the provision of labour in countries, namely India and China where protection against breaches of human rights may be limited.

In general, Bulloughs Cleaning Services Ltd. considers its exposure to slavery/human trafficking to be extremely limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) STEPS

Bulloughs Cleaning Services Ltd. carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Bulloughs Cleaning Services Ltd. has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Bulloughs Cleaning Services Ltd. has taken the following steps to ensure that modern slavery is not taking place:

- All supply chain companies are vetted to make sure they meet the necessary standards as fully documented within our ISO9001 Quality Management Procedures.
- All supplier contracts are reviewed and include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- All purchasers have received necessary training to identify and assess the potential risks in its supply chains.
- Our payroll software will flag up if there is any duplication of a bank account so salaries cannot be paid into a third-party account.
- We utilise electronic identification checks (Ucomply & Ucheck) to ensure all identities are genuine.
- The Board review the policy on an annual basis to ensure that modern slavery is not taking place
- It is emphasised at the outset to all our suppliers that Bulloughs Cleaning Services Ltd. has a zero-tolerance policy towards modern slavery.

H) KEY PERFORMANCE INDICATORS

Bulloughs Cleaning Services Ltd. has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in Bulloughs Cleaning Services Ltd. or its supply chains.

- Regular reviews (quarterly) of all employment contracts carried out by our Head of Payroll to make sure employees could not be used within a modern slavery function – zero tolerance.
- Annual review of supply chain contracts as part of ISO 9001 Quality Management Procedure – zero tolerance
- Communication and personal contact with the next link in our supply chain to ensure they understand and comply with the policies and procedures of Bulloughs Cleaning Services Ltd.

I) POLICIES

Bulloughs Cleaning Services Ltd. has the following policies which further define its stance on modern slavery, a modern slavery policy; a corporate social responsibility policy; supplier code of conduct; recruitment policy.

J) TRAINING

Bulloughs Cleaning Services Ltd. provides the following training to staff to effectively implement its stance on modern slavery - induction training, training on modern slavery policies.

K) SLAVERY COMPLIANCE OFFICER

Bulloughs Cleaning Services Ltd. has a Slavery Compliance Officer (Managing Director), to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to Bulloughs Cleaning Services Ltd. obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed:

A handwritten signature in black ink, appearing to be 'M. M.', is written over a light blue circular stamp.

[Managing Director]

Date: 19th December 2024