



Modern Slavery Statement

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Document No: GGL/Modern Slavery Statement/038

Introduction

Glen Group operates a zero-tolerance approach to modern slavery and human trafficking and is committed to preventing exploitation within its business operations and supply chains. Modern slavery may include slavery, servitude, forced or compulsory labour and human trafficking.

This statement sets out the actions taken and maintained by Glen Group to identify, prevent and manage modern slavery and human trafficking risks. It reflects our continuing commitment under the Modern Slavery Act 2015 and our wider responsibilities arising from developments in UK corporate criminal liability, including Section 250 of the Crime and Policing Act 2026.

The Business

Glen Group is a privately owned contract cleaning company operating across the South of England, Wales and Northern Ireland. Our clients span the public and private sectors and include police forces, councils, schools, universities and organisations across business and industry. Although Glen Group's annual turnover is below the threshold requiring publication of a statement under Section 54 of the Modern Slavery Act 2015, we voluntarily maintain and publish this statement as part of our commitment to responsible business practices, ethical employment and effective governance.

Our Supply Chain

Our supply chain primarily supports the delivery of cleaning and janitorial services and includes suppliers of cleaning materials and equipment, specialist contractors and trades.

We conduct proportionate due diligence before approving suppliers and contractors. This may include reviewing relevant policies, modern slavery statements where legally required, ethical employment arrangements and other available compliance information.

Suppliers and contractors are expected to comply with applicable legislation and Glen Group's ethical and compliance requirements. Where organisations fall below the statutory threshold for producing a modern slavery statement, Glen Group may seek appropriate assurance regarding workforce practices and supply-chain controls.

Policies and Procedures

Our framework for preventing and responding to modern slavery risks is supported by relevant Company policies and procedures, including our Ethical Trading Policy, Whistleblowing Policy, Anti-Slavery and Human Trafficking Policy, Equality and Diversity Policy, Safeguarding Policy, Corporate Social Responsibility arrangements, Work Safe Policy, Recruitment Procedure and Supplier controls.

These documents are reviewed through Glen Group's document-control and governance

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arrangements to ensure that they remain appropriate and current.

Risk Assessment and Management

Modern slavery risks are considered through Glen Group’s risk-management processes. We recognise that exploitation can be complex and hidden and may occur through recruitment practices, labour providers, subcontracting arrangements and supply chains.

Our approach may include supplier due diligence, supplier questionnaires, desk-based research, contractual requirements, management review and escalation of identified concerns. Particular attention is given to areas involving recruitment, agency labour, subcontractors and other circumstances where workers may be vulnerable to exploitation.

Corporate Criminal Liability and Senior Management Responsibility

Glen Group recognises the changes introduced by Section 250 of the Crime and Policing Act 2026, which came into force on 29 June 2026. The provision extends corporate criminal liability so that where a senior manager commits a criminal offence while acting within the actual or apparent scope of their authority, the organisation may also be held criminally liable.

Glen Group acknowledges that whether an individual is a senior manager depends upon their actual role, responsibilities and level of influence within the organisation rather than job title alone.

Directors, senior managers and other individuals with significant responsibilities for recruitment, procurement, subcontractor management, supply-chain management and operational delivery are required to comply with Company policies, procedures, ethical standards and legal obligations.

No Director, senior manager, employee, contractor or representative of Glen Group has authority to ignore, conceal, facilitate or knowingly permit conduct that may constitute modern slavery, human trafficking, forced labour, worker exploitation or other criminal conduct.

Any concern or suspected breach must be reported promptly through appropriate management, safeguarding or whistleblowing procedures. Concerns will be investigated and, where appropriate, reported to the relevant authorities.

Glen Group will continue to review its governance arrangements, management responsibilities, risk assessments, training programmes, procurement controls and compliance monitoring to reduce the risk of criminal conduct within its business operations and supply chains.

Our People and Recruitment

Glen Group supports the principles that employment should be freely chosen, working conditions should be safe and hygienic, child labour should not be used, workers should receive lawful pay, working hours should comply with applicable requirements, discrimination and inhumane treatment should not be tolerated and regular employment practices should be maintained.

Identity and Right to Work checks are completed before employment commences. Reference and DBS checks are undertaken where applicable. Recruitment processes are designed to support lawful and ethical employment and approved agencies are used where agency recruitment is required.

Employees are normally paid directly into an account held in their name. Any unusual recruitment, employment or payment arrangements that may indicate exploitation are expected to be escalated for review.

Training and Awareness

Glen Group continues to promote awareness of modern slavery and human trafficking.

Information and training are intended to help employees and managers understand modern slavery risks, recognise potential warning signs and know how to raise concerns.

Training and awareness arrangements are reviewed periodically, with particular consideration

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given to employees and managers involved in recruitment, procurement, supplier management, agency labour and operational management.

Glen Group uses appropriate monitoring and key performance indicators to assess the effectiveness of relevant policies, training, due diligence and compliance arrangements. These measures are subject to management and Board review.

Ethical Trading

Glen Group is committed to responsible and ethical business practices. We seek to work with reputable suppliers and contractors and expect those organisations to comply with applicable employment, human rights, environmental and modern slavery legislation.

Glen Group does not directly purchase raw materials or goods from overseas producers.

Nevertheless, we recognise that modern slavery risks may exist within extended and indirect supply chains and therefore maintain proportionate supplier due diligence and monitoring arrangements.

Relationships with organisations found to be acting unlawfully or unethically may be reviewed and appropriate corrective or contractual action taken.

Whistleblowing and Reporting Concerns

Employees, contractors, suppliers and other business partners are encouraged to report concerns about suspected unlawful or unethical conduct, including concerns relating to modern slavery, human trafficking, forced labour or worker exploitation.

Concerns may be raised through Glen Group's management and whistleblowing arrangements. Reports made in good faith will be treated seriously and managed in accordance with Company procedures without tolerance of victimisation or retaliation.

Where appropriate, individuals may also be directed to relevant external authorities and specialist support organisations.

Monitoring and Continuous Improvement

Glen Group will continue to monitor the effectiveness of its approach through risk assessment, supplier and contractor due diligence, recruitment controls, training and awareness, reporting arrangements, management review and Board oversight.

Where weaknesses, emerging risks or opportunities for improvement are identified, appropriate corrective and preventive actions will be considered and implemented.

Our Commitment

This statement reflects Glen Group's continuing commitment to preventing modern slavery and human trafficking within its operations and supply chains and to maintaining proportionate governance and compliance arrangements.

Glen Group acknowledges the corporate criminal liability provisions introduced by Section 250 of the Crime and Policing Act 2026 and will continue to maintain appropriate oversight, training, risk management and compliance controls.

This Modern Slavery Statement was approved by the Board of Directors and constitutes Glen Group's Issue 7 statement, issued July 2026. It will be reviewed at least annually and updated where necessary to reflect legislative, organisational and operational changes

Managing Director

Dated: 7th July 2026

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