



Glen Group

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Glen Group as a provider of cleaning and support services and we are committed to operating the business with integrity and to the highest ethical standards.

This commitment includes due regard for the need to prevent modern slavery and human trafficking by the Company and/or its Personnel or any person associated with/ or acting for or on behalf of Glen Group.

This Anti-Slavery & Human Trafficking Policy confirms that **Glen Group** recognises its obligations towards the prevention of modern slavery and human trafficking

Glen Group achieves its objectives by:

- Ensuring understanding of modern slavery and human trafficking
- Ensuring a zero-tolerance approach to the prevention of Modern Slavery and Human Trafficking through the general conduct of our business.
- Ensuring all **Glen Group** management are aware of the requirements and the procedure in managing any breaches.
- Ensuring appropriate administration and audit to minimise the chance that this may occur.
- Conducting internal checks and audits
- Conducting a proportionate amount of due diligence in relation to other relevant third parties, such as business partners; and
- Insisting that clients, business partners, subcontractors, agents and other relevant third parties work to prevent this.

Modern Slavery is a crime and violation of fundamental human rights. It takes various forms such as slavery, servitude, forced compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty, by another to exploit for a personal or commercial gain. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited

Prepared By	Reviewed By	Approved By	Version 2
Alan North	Kim Stevens	Ross Barnes	March 2023
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Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, contractors, and suppliers.

Glen Group strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our business or in any of our supply chains.

We expect that our suppliers will hold their own suppliers to the same high standards.

Commitments

- We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:
- We have a zero-tolerance approach to modern slavery in our business and supply chain.
- The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or on our behalf. Employees must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our sub - contracting processes and keep them under review. Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Compliance with this policy

All employees must ensure that they read, understand, and comply with this policy and have received Glen Aware Training.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If they believe or suspect a breach of this policy has occurred or that it may occur, they must notify their manager, or they may report it in accordance with our Whistleblowing Policy as soon as possible. .

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. **Glen Group** is committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

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Communications and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided, as necessary. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Consistent with our risk-based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to the business to confirm their compliance with our Code of Conduct
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that others working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

Signed:

MD-Glen Group Limited

March 2023

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