



## Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Glen during year ending 31<sup>st</sup> December 2024 to prevent modern slavery and human trafficking in its business and supply chains.

### Introduction

Glen operates a zero-tolerance policy to modern slavery and human trafficking and is committed to making every effort to eradicate the horrendous impact of this hidden crime from our business and supply chains. We recognize that modern slavery and human trafficking are a global and growing issue, and no sector or industry can be considered immune. We define modern slavery in line with the United Nations Guiding Principles on Human Rights as:

***“One person depriving another of their liberty in order to exploit them for personal or commercial gain”***

This is our first statement and builds on the work and commitments within our business, it outlines the steps we have taken in the financial year ending 31<sup>st</sup> December 2023 to meet our obligations under section 54(1) of the Modern Slavery Act 2015

### The Business

With over 1700 employees and trading for over 35 years, Glen is one of the largest privately owned contract cleaning companies operating across the South of England, Wales, and Northern Ireland, with a reputation for progressive, environmentally conscientious Cleaning and Janitorial Services where the traditional values of customer service and honesty remain at our core. Our wide array of clients spans both the public and private sectors and includes the Police Forces, Councils, Schools, and Universities as well as a huge selection of clients from business & industry. All of whom rely on us to provide efficient cleaning and support services, where our diligent approach delivers value for money and peace of mind.

Our commitment to service excellence has ensured we remain at the forefront of our industry where a diligent and reliable approach ensures our clients can trust us to deliver consistent results within an ever-changing environment.

The annual turnover of Glen is below that of the requirements of Section 54 of the UK Modern Slavery Act (2015). However, Glen is committed to ensuring that modern slavery or human trafficking is not taking place within their business or supply chain.

### Our Supply Chain

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Alan North	Kim Stevens	Ross Barnes	June 2024
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As a company predominately offering Cleaning & Janitorial support services to our clients, our supply chain is characterized by skilled technical contractors and trades. Occasionally we use contractors to support our operational requirements in certain areas (e.g., window cleaners) The materials we buy are in support of the services we deliver.

- We conduct due diligence with all suppliers before allowing them to become preferred suppliers, which includes searches to ensure that they have not been convicted of any offences relating to modern slavery.
- Where the supplier is required to comply by law with the Modern Slavery Act, we will ensure that their policies and procedures are compliant.
- For suppliers who fall below the necessary compliance limits, we will wherever possible encourage them to comply with the Modern Slavery Act of their own free will as we do.

### **Policies and Procedures**

Glen recognises any organisation, developing appropriate policies is an essential first step to tackling modern slavery and wider human rights impacts in their operations and supply chains. Paragraph 5 of Section 54 of the Modern Slavery Act 2015 sets out that a company's slavery and human trafficking statement may include information about 'its policies in relation to slavery and human trafficking'.

Our relevant policies and procedures include:

- Code of Practice (Ethical employment in supply chains) Llywodraeth Cymru
- Ethical Trading Policy GGL 007
- Whistleblowing Policy GGL014
- Anti-Slavery and Human Trafficking Policy GLC005
- Absence and Wellbeing Policy GGL004
- Equality and Diversity Policy GGL006
- Safeguarding Policy GGL008
- Corporate Social Responsibility GGL010
- Work Safe Policy GGL009

All Dated June 2024

### **Risk Assessment & Management**

The annual Modern Slavery risk assessment approach is aligned with the Glen risk register method, considering changes to external and internal risks and how these are mitigated. The manifestations of Modern Slavery are complex and hidden, so our risk assessment includes us to prioritize activity.

Due to the small number of suppliers and sub-contractor we use desk-based research, supplier surveys, supplier engagement, and discussions with expert stakeholders.

### **Our Team**

In line with the Modern Slavery Act, we endorse the beliefs of the United Nations Global Compact Principles, the International Labor Organisation Declaration on Fundamental Principles and the Rights at Work and the Ethical Trading Initiative 'Base Code'.

### **Example of Base Code**

1. Employment is freely chosen.
2. Freedom of association and the right to collective bargaining are respected

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3. Working conditions are safe and hygienic.
4. Child Labor shall not be used.
5. Living wage shall be paid.
6. Working hours are not excessive.
7. No discrimination is practiced.
8. Regular employment is provided.
9. No harsh or inhuman treatment is allowed.

We strive to ensure that employment is chosen freely; freedom of association is respected; working conditions are safe and hygienic; child labour is not used; wages are not lower than minimum wage; working hours are not excessive; no discrimination is practiced; regular employment is provided; and no harsh or inhumane treatment is permitted.

We endeavor to carry out appropriate checks to ensure that any new applicant is suitable for the role that they have applied for. Prior to making an offer, it is our usual practice to ensure that all applicants are aware of what checks we will carry out. We make job offers subject to appropriate satisfactory vetting procedures (where required).

All our people undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks. We employ most of our people directly or on a fixed-term basis with checks in place to ensure that payment of salary is made direct to that person.

In addition to striving to ensure compliance with legislative requirements, we carry out additional background checks on a risk basis, either through our own assessment or one carried out in conjunction with our client.

Our Recruitment Procedure outlines the mandatory requirements we impose, which includes the requirement to use approved agencies in the recruitment process (when required). Our Suppliers Procedure seeks to ensure that third party providers can demonstrate that they comply with all legal requirements, including the requirement to comply with the Modern Slavery Act 2015.

### **Training & Awareness**

We continue to strengthen employee awareness of our stance on slavery and human trafficking. We have also updated our Anti-Slavery and Trafficking Policy for Suppliers Guidance which complements the training created for our own people, so they understand the issues involved, become more aware of the risks, the signs to be vigilant of and how to raise awareness should they see or fear something suspicious. In 2023 we have built a training presentation for all employees, so they can be made aware of the issue and what to look for during their daily routine (available on our App)

We believe that improved awareness is one of our most effective methods to reduce the risk of modern slavery and with the help of both our employees and suppliers we aim to ensure that there are no opportunities to hide forced labour within our organisation or our supply chain.

To spread awareness, we have created an animated slide show and Glen also uses a bi-monthly video briefing, which includes Modern Slavery. We also create articles and information briefings for all our personnel to complement the guidance provided to suppliers. We are taking a targeted approach to more detailed training on slavery and human trafficking (either by way of workshop training or an e-learning module, as appropriate). This will cover the people involved in our procurement processes and the hiring of staff, especially where this involves the promotion and monitoring of our agency workers.

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We are using several key performance indicators (KPI's) to measure how effective we have been in communicating awareness of our core policies and procedures related to the requirements of the Modern Slavery Act, and our other actions to seek to ensure that slavery and human trafficking is not taking place in any of our business or supply chains. The KPI's used to measure against will be subject to ongoing review by the Board to ensure their continued effectiveness.

### **Ethical Trading**

Ethical Trading is trade that attempts to be socially and environmentally responsible. It is trade in which companies and their employees should take responsibility for the social and environmental impacts of their business.

Ethical trading is an attempt to address failings of the global trading system such as:

- The exploitation of child labour
- Racial and gender discrimination in employment policies
- Poverty wages
- The use of chemicals harmful to farmers, consumers, and the environment

Glen does not undertake work outside the United Kingdom, trade internationally nor purchase raw materials or goods directly from foreign producers.

We purchase materials, equipment, and other resources only from reputable suppliers.

We are certified to ISO 14001: 2015, The Environmental Standard and are committed to an Environmental Action Plan details of which are contained within our Environmental Policy.

The Group is committed to ensuring that all employees, contract workers, subcontractors and clients are treated equitably and fairly and with dignity and respect. Glen will review its relationships with any company found to be trading unethically or in such a way as to discriminate against, harm or disadvantage their suppliers, employees, or the environment.

### **Whistleblowing**

We encourage clients' customers and suppliers to report any concerns about unlawful conduct that they suspect is taking place at work. This includes any concerns regarding the risk of slavery or human trafficking.

Our Whistleblowing Procedure provides our people and our business partners with the ability to report suspected wrongdoing via the chain of command, if they feel the need for more privacy, they can contact the MD whose number is widely available on the Whistleblowing Policy or on the website. This service enables concerns to be reported without fear of retaliation in the knowledge that we do not tolerate harassment, victimization, or reprisals against anyone raising a concern in good faith.

In addition, employees who believe that they have come across an instance of modern slavery (or who may be a victim) and who need information and/or guidance on remedy, compensation and justice will be advised of their right to contact the Modern Slavery Helpline and/or other specialist support and assistance providers across the UK.

**Environment & Mitigation.** The potential risk of Modern Slavery arises from the following key scenarios:

- The risk that we procure goods or services for our own consumption where there is an

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unethical supply chain.

- The risk that we partner alongside organisations with an unethical supply chain, or we engage, invest, lend, or sell land to organisations with an unethical supply chain.

We mitigate these risks by:

- Using vetted and monitored framework panels/suppliers demonstrating compliance with the requirements of the Modern Slavery Act.
- Up-front compliance requirement in our tender and procurement documentation, enforced at delivery by contractual conditions and agreements; and including appropriate termination clauses. This is supported by pre-procurement dialogue and monitoring throughout the duration of the contract.
- Customer due diligence research to identify organisations and individuals with criminal convictions or a higher potential risk of non-compliance.
- Requiring applicants to provide details of their development scheme; this provides us with an opportunity to identify potential supply chain risks within the development specifications.
- Requesting management information from our panel firms in relation to the training they provide both internally to their staff and externally to their contractors. These requests have provided Glen with the assurance of being able to measure the compliance of our contractors against our procurement controls. For those companies who do not produce an annual MSA statement, (due to their turnover being below £36 million), Glen has requested that these contractors we engage with produce a statement detailing that it has considered its obligations regarding the suitability of its workforce and its supply chains. This is consistent with the recommendations contained in the independent review

### **Our commitment**

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Glen Group's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2024 as approved by the Board of Directors. Glen look forward to updating their progress in the 2025 statement.

Signed: 

Managing Director

Date: June 2024

Statement Review: January 2025

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