

Anti-Slavery and Human Trafficking Statement

As a company, Not Just Cleaning Ltd (NJC) maintains relationships with many different organisations in its supply chain, as well as employing directly large numbers of people. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains. The statement below underpins our approach.

NJC has adopted a statement of our corporate value on the prevention of modern slavery and human trafficking. The statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all or who have, or seek to have, a business relationship with NJC to familiarise themselves with our anti-slavery statement and to act at all times in a way which is consistent with our anti-slavery statement.

Anti-slavery statement

As part of our culture of good governance for good business, NJC operate to a set of core values which reflect our relationships with our principal stakeholder groups: customers, manufacturers, shareholders, suppliers and employees. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings including contractors and suppliers. We have a zero-tolerance policy in relation to modern slavery.

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, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy is non-contractual and we reserve the right to amend it at any time.

Statement purpose

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the statement of NJC (the “Company”) with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This statement’s use of the term “modern slavery” has the meaning given in the Act.

The cleaning specialists

NJC Limited, Zig Zag Building, 70 Victoria Street, London SW1E 6SQ

Registered office address as above. Company number 03463222.

As a company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

Steps for the prevention of modern slavery

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery through-out our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees' obligations under their contract of employment.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

- 1) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- 2) engage with our suppliers both to convey to them our Anti-Slavery Statement and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- 3) introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

We undertake an audit of personnel records a minimum of every 6 months to check for duplicate bank details and home addresses and address any queries as appropriate.

We do not allow wages to be paid into a bank account which is not in the name of the employee.

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Responsibility for the policy

Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The Board of Directors of the Company has overall responsibility for ensuring this statement and its implementation comply with our legal and ethical obligations.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this statement.

How to report modern slavery or human trafficking

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner.

The Whistleblowing Procedure applies to employees and may be found in the Employee Handbook and a copy of the Procedure is also available from the Human Resources Department.

Safeguards

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. We are committed to ensuring no one suffers any detrimental treatment as a result 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Communication and awareness of this policy

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.

Breaches of this policy

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

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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