



## MODERN SLAVERY STATEMENT:

### 1. SCOPE & PURPOSE:

#### A) ORGANISATION:

This statement applies to all companies within and associated to The Exclusive Services Group (referred to in this statement as 'The ECS Group'). The information included in the statement refers to the financial year 2018/2019.

#### B) ORGANISATIONAL STRUCTURE:

Exclusive Services Group consists of Exclusive Contract Services and Brayborne Cleaning Services, ECS are the parent company for Brayborne cleaning and specialist services.

ECS employ over 3500 staff in sites across the UK & Ireland, our organisation support services include Administration, Accounting, Human Resources and Payroll are based at office locations across the UK in Hatfield - Hertfordshire, Swindon - Wiltshire and Wokingham - Hampshire.

Please refer to our Company Management Structure for further details of our location for each of these services.

Exclusive Contract Services Group is a major player in today's marketplace, offering a wide variety of service provision, with a national capability. The original company was founded in 1987 to provide high quality cleaning and support services to all sectors of the marketplace – commercial, retail, leisure, governmental and educational. As a registered BS EN UKAS ISO 9001:2008 company we have an accredited and proven quality programme practised throughout the organisation.

Exclusive provides high-class retail cleaning services throughout the UK and Ireland. Whether for independent stores or chains, on high streets, retail parks or in shopping centres, we work in partnership with our clients to deliver clean and safe environments for both the staff and customers. Our experience dictates that we must help you enhance your brand if we are to retain your business.

Our policy takes into account the process of managing the pressures of the marketplace, including trading patterns & seasonal footfall trends. While always seeking to deliver cost savings, The Exclusive Group maintain the very highest standards customer's expectation.

Exclusive employees are fully trained and contribute massively to the high standards maintained by our clients. Delivering cleaning services to hundreds of stores and to a major national high street brands, we offer a robust, effective and reliable service based on consistency and attention to detail.

Exclusive Contract Services Limited  
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[www.exclusivecontracts.co.uk](http://www.exclusivecontracts.co.uk)

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UK shoppers now have an enviable choice. With this choice comes a fiercely competitive marketplace. Exclusive plays a crucial role in ensuring all sites are cleaned to the highest standard so that their customer's experiences are always a great one. Supported by dedicated Account and Operations Managers and our expert cleaning teams. The labour supplied by the *Exclusive Services Group* in pursuance of its operation is carried out only in the UK and Ireland

### C) DEFINITIONS:

The Group consider that the Modern Slavery Act 2015 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) PURPOSE:

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

The ECS Group 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 the ECS Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in *the UK and Ireland*.

### E) SUPPLY CHAINS:

In order to fulfil its activities, the ECS Group main supply chains will include those related to trading with ECS Group for cleaning products & consumable suppliers, machinery suppliers UK and abroad.

*ECS group does not recognise any Trade Union involvement required with this policy.*

### F) POTENTIAL EXPOSURE:

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The ECS Group considers its exposure to slavery/human trafficking to be *relatively 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:

The ECS Group 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.

The ECS Group 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, the Exclusive Services Group has taken the following steps to ensure that modern slavery is not taking place:

- Based on the 3<sup>rd</sup> party approach to slavery and the retention of documentation and passports, our company policy and practice operate an ongoing Passport Scanning auditing procedures within our current portfolio. The scanner is independently retained and used on a scheduled basis by our HR team who, on a monthly basis, randomly pick sites within the wide variety of clients throughout our portfolio. The list is made known to the CEO, board and DMD's only and the results of any visits are advised to all on completion.
- *Annual reviews have taken place of our supplier chains and practices*
- *All employees have been paid in-accordance our regulated time and attendance systems*
- *Employees pay review have been reviewed and increased in-line or above National Living wage rates.*
- *Any acts of unfair treatment, harassment or bullying are reviewed and investigated in accordance with our grievance procedures. – No reported incidents have been investigated for 2016.*

### H) KEY PERFORMANCE INDICATORS:

The Exclusive Contract Services Group has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the company or its supply chains.

- *Frontline staff are trained to identify the key indicators of any potential victims of trafficking or slavery as per the guidance issued on "Victims of Modern day Slavery"*





- Further training and support have been trained on managing any potential incidents identified.
- One to one annual visits are conducted with all our supplies and contractors.

### I) POLICIES:

The *Exclusive Contract Services Group* has the following policies which further define its stance on modern slavery

- CSR policy – accessed via the company website
- Bullying and harassment policy – accessed via the company public drive
- Equality policy – accessed via the company public drive
- Regulations under our partnership with contractors and suppliers policy – accessed via the company public drive.

### J) SLAVERY COMPLIANCE OFFICER:

The Exclusive Contract Services Group has a Slavery Compliance Officer – Lisa Hylton – Group Human Resources Director, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Exclusive Contract Services Group 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.

### Managing Director

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