



## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

This statement sets out Easy Cleaning Solutions Ltd (the organisation) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the manufacturing sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

This statement covers the activities of Easy Cleaning Solutions Ltd:

Easy Cleaning Solutions Ltd is a chemical cleaning manufacturing company based in Thetford in the United Kingdom. Easy Cleaning Solutions Ltd are experts in private label household cleaning solutions, blending chemicals, packing, filling and design.

### *Countries of operation and supply*

The organisation currently operates in the following countries:

- United Kingdom

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- All recruitment of permanent employees follows UK legislation and good practice.
- Induction of new employees includes information on Modern Slavery and how to spot potential issues.
- All recruitment of agency employees follows UK legislation and good practice.
- Induction of new agency workers included information on Modern Slavery and how to spot potential issues.

### *High-risk activities*

The following activities are considered to be at high risk of slavery or human trafficking:

The highest risk currently to the organisation is the employment of daily agency workers through the recruitment agencies. These recruitment agencies are audited on a 6-monthly basis to ensure full compliance with all local laws. The audit itself is unannounced and checks all paperwork that ensures



compliance. A record of the audit and associated actions are kept with any follow up actions given a timeframe for completion.

### *Responsibility*

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The HR Team has produced an Ethical Rights and Human Rights Policy which is reviewed on an annual basis.
- **Investigations/due diligence:** The HR Team are responsible for carrying out any investigations in relation to allegations of slavery or human trafficking.
- **Supply Chain / Procurement –** The Procurement and Technical Teams are responsible for carry out potential and existing Supplier audits, elements of which relate to slavery or human trafficking.

### **Relevant policies**

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy** - The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can confidentially implement this policy at any given time.
- **Employee code of conduct** - The organisation's handbook and policies makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct** - The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

### **Due diligence**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:



- mapping the supply chain broadly to assess particular products or geographical risks of modern slavery and human trafficking;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own employees, where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular the "Stronger together" initiative;
- using ETI database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

#### **Performance indicators**

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- requiring all HR professionals to have completed training on modern slavery by end of 2017;
- The organisation has a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Ongoing review of its existing supply chains, whereby the organisation evaluates all existing suppliers.

#### **Awareness-raising programme**

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.



### **Director approval**

This statement was approved on 6 July 2018 by the organisation's HR Director, who review and update it annually.

Director's signature:

A handwritten signature in black ink, appearing to be 'Darren Mosley', written over a horizontal line. The signature is stylized with loops and a long trailing stroke.

Darren Mosley  
Chief Executive Officer

Date: 10 July 2018