

Modern Slavery Policy

This statement applies to Enviro-Clean (Scotland) Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2019-2020.

Enviro-Clean (Scotland) Ltd is a privately-owned company formed in 1995 and has one centralised office which is the main base for all employees. The organisation is controlled by a managing director supported by other Directors which forms the business steering group.

The company is located at 8 Hawbank Road, College Milton, East Kilbride, Glasgow G74 5HA and currently have approximately 130 employees.

The principal activities of Enviro-Clean (Scotland) Ltd are specialist waste management and industrial services / advice to domestic, commercial and industrial customers. Demand for our services is high throughout the year with little seasonal impact. The work activity is normally carried out at the customer's site / premises.

Enviro-Clean (Scotland) Ltd work is wholly carried out in the United Kingdom with the majority of the work taking place in Scotland and northern England.

The Organisation considers that modern slavery 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.

Enviro-clean (Scotland) Ltd acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Enviro-clean (Scotland) Ltd understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Enviro-clean (Scotland) Ltd 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.

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No labour provided to Enviro-Clean in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The company strictly

adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in Scotland.

In order to fulfil its activities, the companies main supply chains include those related to the supply of commercial vehicles, vehicle fuel, vehicle parts and work clothing. Suppliers are based in United Kingdom and the European Union. We understand that the Enviro-Clean (Scotland) Ltd.'s first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

Enviro-Clean (Scotland) Ltd considers its main exposure to the risk of slavery and human trafficking to exist in the supply of work wear, if our suppliers use a supply chain which includes a country where protection against breaches of human rights may be limited.

In general, Enviro-Clean 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.

We have strong links to the local community and build long standing relationships with suppliers.

Where we use national or international supply chains, our point of contact is generally with a UK company or branch and we would expect them to have suitable policies and procedures. We expect each entity in the supply chain to adopt a "one up" due diligence on the next link in the chain as it is not practical for us (or others) to have a direct relationship with all links in the supply chain.

Enviro-Clean (Scotland) Ltd 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.

Enviro-Clean (Scotland) Ltd 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, Enviro-Clean (Scotland) Ltd has taken the following steps to ensure that modern slavery is not taking place:

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- Within the present financial year, the company has introduced a statement (though not legally required due to turnover) aimed at ensuring no modern slavery or human trafficking takes place in any part of the business.
- The business has a zero-tolerance policy towards slavery and human trafficking and has raised staff awareness by email of this statement and of the modern slavery act and its impact on the business
- Review of current suppliers? Supplier audits?
- Copy of statement to be sent to all suppliers?

Enviro-Clean (Scotland) Ltd has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in Enviro-Clean or its supply chains.

- In the event of concerns or allegations being made regarding slavery or human trafficking, an investigation will be undertaken by members of the board
- List of suppliers to be continually updated

All concerns regarding modern slavery issues should be reported to the head of Human Resources, who will then undertake relevant action with regard to the company's 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.



James McLuskey
Managing Director

10th January 2021