

# MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

## STATEMENT OF GENERAL POLICY

### Introduction

This statement sets out Mayfair Cleaning Company's 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. This statement relates to actions and activities during the financial year ending 30th September 2018.

As part of the cleaning industry, 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 Mayfair Cleaning Company Limited:

- Mayfair Cleaning Company Ltd is an independent cleaning company specialising in prestige office cleaning. The Company was founded in 1910 and has achieved fundamentally 108 years' experience within the industry.
- Mayfair Cleaning Company Ltd develops partnerships with its clients, understanding their cleaning needs and strategy; this enables the Company to provide an individual service to meet the client's needs and expectations.
- Mayfair Cleaning Company Ltd provides specialist services within the provision of cleaning and waste consultancy, training, daily and periodical cleaning, carpet and hard floor deep cleaning, high level and window cleaning.
- The organisation's workforce is employed on a permanent contractual basis. All right to work, residency, and employment history verification checks are conducted in accordance with the Immigration, Asylum and Nationality Act 2006 and our own Recruitment Policy.

There are no activities that are considered to be at high risk of slavery or human trafficking for the Mayfair Cleaning Company Ltd., although we recognize the potential for any and all low paid low skill set industries. Through the supplier/procurement code of conduct the Company will ensure that all suppliers will also adhere to the Modern Slavery Act 2015.

### Responsibility

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

- Policies: CEO and Compliance & Training Director  
Investigations/Due Diligence: The Compliance & Training Director is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.

- Training: The Compliance & Training Director is responsible for ensuring that the awareness of slavery and human trafficking risks are communicated throughout the organisation and through the supply chain.

### **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:

- Employee Concerns (Whistleblowing) Policy: The organisation encourages all its stakeholders to report any concerns related to the direct activities, or the supply chains of, the organisation. This can include any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's policy is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report any activities associated to slavery and human trafficking by contacting their immediate line manager or the Compliance & Training Director in confidence.
- Employee Code of Conduct: The organisation's code 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. As part of the supply chain selection process all potential and existing suppliers are required to complete a Supplier Questionnaire to assess their suitability as a supplier. Within the Supplier Questionnaire all suppliers are required to provide evidence of their compliance towards Labour Standards and the principals of this standard as well as the Asylum & Immigration Act 2006.

This enables the procurement team to identify any potential risks to the quality of the service provision or goods being provided by the supplier and prevent any slavery or human trafficking. All suppliers are audited against the supplier code of conduct.

- Recruitment Policy: The organisation only employs people on a permanent contractual basis. Prior to commencement of employment all employees are subject to right to work, residency and employment checks in accordance with the Immigration Asylum and Nationality Act 2006 and the Mayfair Recruitment Policy. The Recruitment Policy is compliant to all EU and UK legislation, including the minimum wage and therefore is not at risk of slavery and human trafficking.
- Corporate Governance & Social Responsibility Policy: Mayfair Cleaning Company' Corporate Governance and Social Responsibility covers the responsibilities of the Board of Directors and the organisation's commitment towards the external Environment,

Health & Safety, Workplace responsibilities and assurance to the supplier chain code of conduct. The Policy is communicated to the whole workforce and forms part of the induction programme.

- **Anti-Bribery/Fraud Policy:** The organisation's Anti Bribery Policy aims to prevent any form of bribery being committed within the organisation and by any stakeholder(s) associated with its business. Mayfair Cleaning Company's Board of Directors fosters a culture of integrity where bribery is unacceptable. This policy is communicated to all employees and forms part of the induction programme.

### **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:

- evaluating the modern slavery and human trafficking risks of each new supplier in accordance with the supply chain selection process;
- conducting supplier audits through the Mayfair Cleaning Company Compliance Director, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- If required, take steps to improve substandard suppliers' practices, including providing advice to suppliers and require them to implement action plans where applicable. Audits carried out on Mayfair Cleaning Company suppliers have confirmed that they meet the Mayfair Cleaning Company supplier code of conduct and therefore no improvement plans have been invoked;
- If required, invoke 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. Audits carried out on Mayfair Cleaning Company suppliers have confirmed that they meet the Mayfair Cleaning Company supplier code of conduct and therefore no sanctions including termination of contracts have been issued.

### **Performance Indicators**

In light of the introduction of the Modern Slavery Act 2015 the organisation will:

- Review its existing supply chains by the end of the financial year, this being 30th September 2018 to ensure their compliance to the Modern Slavery Act 2015.

### **Training**

The organisation will require all staff, including managers within the organisation to receive awareness training on modern slavery as a module within the organisation's induction, management development and refresher programs.

The organisation's modern slavery awareness training will cover:

- our business' purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

#### **Awareness-Raising Programme**

As well as training staff, the organisation will raise awareness of modern slavery issues uploading flyers on Mayfair's employee web portal.

The flyers explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- 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.

#### **Board Member Approval**

This statement has been approved by the organisation's board of directors, who review and update it annually.



**Andrew Prendergast, Chief Executive Officer**  
**January 2021**