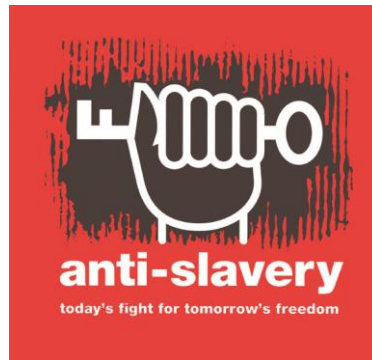


# Anti-Slavery Policy and Statement

1. General Statement.....	1
2. Definition.....	2
3. Scope.....	2
4. Responsibilities & Arrangements.....	2
4.1 Duties of Employees, Managers and Supervisors .....	2
4.2 Information and training.....	2
4.3 Duties of Sub-contractors .....	3
5. Associated Policies.....	3
6. Further Reading.....	3



## 1. General Statement

In compliance with section 54 of the Modern Slavery Act 2015, CCM Facilities Ltd (referred to as CCM hence forward) is not required to produce an annual report as CCM is not a commercial organisation with a turnover more than £36 million. However, despite this exemption from providing an annual report CCM has still adopted a policy to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

CCM has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

<p>Endorsed by; </p> <p style="text-align: center;">Greg Doherty, Managing Director:</p>	<p>Dated: 01/06/2019</p>
---	--------------------------

## 2. Definition

Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

## 3. Scope

The scope of this policy will apply to all company operations as described under the definition above and within the **Modern Slavery Act 2015**.

## 4. Responsibilities & Arrangements

### 4.1 Duties of Employees, Managers and Supervisors

Company employees should also raise their concerns under this policy if it is the duties of employees to notify management if there is any indication that modern slavery practices have been identified.

Company employees should also raise their concerns under this policy if it is reasonably believed that there is an indication that modern slavery practices have been identified. This Policy will apply where malpractice is suspected concerning:

- Contract Cleaning and Maintenance (London) Limited
- A CCM employee
- A CCM customer

Should a CCM employee experience a concern that slavery is taking place, they should raise the matter in the first instance with a Supervisor/Line Manager who may be able to resolve the matter informally and locally. Where there may be a conflict of interest, such that an employee cannot raise an issue with their line manager, the issue should be raised with a more senior manager. Alternatively you may contact the Head Office for further guidance as it is vitally important that CCM has the opportunity to resolve such instances within the Company with the utmost speed and efficiency and to ensure complete compliance with the Modern Slavery Act 2015.

CCM therefore seeks to ensure that our Anti-Slavery Policy is understood and applied throughout the Company through effective internal and external communication channels and including appropriate training for our staff with due monitoring and review of the Policy undertaken at regular intervals to incorporate any amendments or make improvements where necessary.

### 4.2 Information and training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. All employees have access to all CCM policies.

Currently CCM only provides services in the United Kingdom and all staff are screened and comply with the corresponding UK 'Right to Work Regulation'.

### 4.3 Duties of Sub-contractors

CCM operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. Our anti-slavery policy is issued to all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) they pay their employees at least the national minimum wage.
4. We may terminate the contract at any time should any instances of modern slavery come to light.

### 5. Associated Policies

. Our associated policies to the Anti-Slavery Policy are the following:

- Employment of Young People and Children Policy
- Recruitment Policy
- Anti-bribery Policy
- Home Workers
- Equal Opportunities
- Corporate Social Responsibility Policy
- Safety From Violence and Abuse At Work
- Subcontractors Policy and Control

### 6. Further Reading

For further reading please refer to the following links:

The UK Government (October 2015), Transparency in Supply Chains etc. A Practical Guide.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/471996/Transparency\\_in\\_Supply\\_Chains\\_etc\\_A\\_practical\\_guide\\_final\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc_A_practical_guide_final_.pdf)

Slaughter and May (March 2016), Modern Slavery Act 2015 Compliance and Reporting.

<https://www.slaughterandmay.com/media/2535492/modern-slavery-act-2015-compliance-and-reporting.pdf>