

## Modern Day Slavery and Human Trafficking Policy

### Introduction

This statement applies to **Lewis cleansing Limited** (the organisation) and it's business activities, which are the commercial cleaning and support services of schools, NHS practises, offices and business premises. The purpose of this is to set out the steps that Lewis Cleansing has taken to ensure that slavery and/or human trafficking does not take place in our business or supply chains.

### Organisational structure

Lewis Cleansing was established over 15 years ago, and since then, we have grown year on year to become one of the top commercial cleaning companies in the West Midlands. We employ over 250 staff that aid us in supporting a diverse customer base, including schools, NHS practices, Local Authorities and businesses.

Our Head Office is located in Kidderminster, with Operations Staff throughout the West Midlands and as far south as Bristol.

### Definitions

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 or 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.

### Commitment

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

The Organisation 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 Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the standards required in

relation to its responsibilities under relevant employment legislation set out in the Modern Slavery Act 2015.

## **Supply chains**

As a commercial cleaning company, certain services beyond our scope of expertise are contracted to qualified contractors and trades.

## **Potential exposure**

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist when the Organisation purchases products from outside of the United Kingdom, where anti-slavery and human trafficking legislation may not be in place.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited/relatively low, as the majority of our products are manufactured in the united kingdom, and services are rarely subcontracted to other businesses.

## **Steps**

The Organisation 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 Organisation 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 Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- measures in place to identify and assess the potential risks in its supply chains
- undertaking impact assessments of its services upon potential instances of slavery
- creating action plans to address risk to modern slavery
- any actions taken to embed a zero tolerance policy towards modern slavery


## **Training**

Through training, we hope to strengthen our employee awareness on slavery and modern day human trafficking, therefore becoming more vigilant to the signs and how to raise awareness should they see anything suspicious.

## Whistleblowing

The Organisation encourages all staff, customers and suppliers to report all concerns regarding unlawful conduct, including slavery and/or human trafficking, that they suspected is taking place within the Organisation. Further details regarding whistleblowing can be found in our Whistleblowing Policy.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Document	Modern Slavery Statement	
Version	1.0	
Author	Harry Lewis	
Date of Version	27/08/2024	