

# Modern Slavery and Human Trafficking Statement

## INTRODUCTION

**GM Facilities** (the 'Company') is committed to acting ethically and with integrity in respect of all its business activities. The Company adopts a zero-tolerance approach to modern slavery and human trafficking throughout all of its business dealings and expects its suppliers and clients to adopt a similar approach. In doing so, the Company endorses full compliance with relevant laws through the implementation and promotion of ethical business practices to protect workers from being exploited both within **GM Facilities and its clients**.

This statement, which is made pursuant to Section 54(1) of the Modern Slavery Act 2015, outlines the potential risks and significant steps adopted by the Company to ensure that modern slavery or human trafficking does not occur in Custom Cleaning Services Ltd and/or any of its clients.

This statement applies to all employees, workers or any persons working for us on our behalf in any capacity, including agency workers, contractors, external consultants, third-party representatives and business partners.

## Organisational Structure

**GM FACILITIES** purpose is to provide a first-class service to the Hotel industry, Office Cleaning, Apartment Blocks, Restaurant and Kitchen Cleaning, Carpet Cleaning, Window Cleaning, Computer Cleaning, etc. We were established in 2001 and have grown at a significant pace since that date, both in terms of clients and numbers of employees. Our Head Office is in **35 New Broad Street, EC2M 1NH**, London.

The Company currently provides its services in the UK.

Therefore, pursuant to the Modern Slavery Act, **GM FACILITIES** expects any suppliers or clients with whom they conduct business with to adopt similar high standards in the pursuit to prevent modern slavery or human trafficking by having a Modern Slavery and Human Trafficking statement or policy in place. The relationship with many of suppliers has been established over a number of years and is based on close links and contact with the owners and directors. As and when the Company engages in business dealings with new suppliers, the Company undertakes due diligence to ensure there is no modern slavery or human trafficking activity occurring both within the business or any of its supply chains.

## Responsibility

The CEO, and the senior management team have overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all employees comply with the policy. The Directors have overall responsibility for implementing and reviewing this policy and monitoring its use and effectiveness.

### **Relevant Policies**

**GM FACILITIES** has several policies in place, which outline the Company's approach towards the identification of modern slavery and human trafficking risks and any necessary steps to be taken to prevent slavery and human trafficking in its operations. These policies include:

- Whistleblowing Policy – The Company encourages all its employees, workers or customers to report any concerns regarding any circumstances which may give rise to an enhanced risk of slavery or human trafficking. Custom Cleaning Services' Whistleblowing Policy enables workers to disclose information confidentially. For further information on this policy please refer to the full Whistleblowing Policy, available from HR.
- Equal Opportunities Policy – The Company provides a fair and equal working environment that is free from all forms of discrimination in all areas of employment. All employees are treated fairly with regard to protected characteristics; race, religion and belief, pregnancy and maternity, sex, marriage and civil partnership, disability, gender-reassignment, age, and sexual orientation. For further information regarding this policy, please refer to the full Equal Opportunities Policy, available from HR.
- Anti-Bribery & Corruption (ABC) Policy for Suppliers - A policy for use by our suppliers outlining the controls and standards we expect.
- Code of Ethics – The Company's code of ethics outlines the ethical principles expected by Custom Cleaning Services and its employees, in order to maintain our reputation for integrity, honesty and professionalism. Our ethical principles are designed to guide us, complement and enhance any applicable laws, regulation and professional conduct requirements.

### **Due Diligence**

**GM FACILITIES** is actively undertaking due diligence when considering taking on new suppliers. The Company's due diligence approach includes:

- Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour;
- We have in place systems to encourage the reporting of concerns and the protection of whistle-blowers;
- Obtaining verification that any new suppliers/contractors have a Modern Slavery and Human Trafficking statement or policy in place;
- Ensuring any form of child labour or exploitation is not present in any part of the business or its supply chain;

- Ensuring employees are paid at least the National Minimum Wage or National Living Wage, depending on their eligibility;
- Ensuring the absence of all forms of discrimination in any aspect of the business or its supply chain, including recruitment and selection procedures, access to training and promotions etc.;
- Ensuring right to work and pre-employment checks of all staff are conducted appropriately;
- Ensuring no harsh or inhumane treatment is allowed in any part of the business or its supply chain in line with the Company's Equal Opportunities Policy;
- Using only specified, reputable employment agencies to source labour, and verifying the practices of any new agency prior to sourcing labour from that agency;
- Ensure staff are aware of the procedure to follow, should they have concerns regarding any circumstances which may give rise to an enhanced risk of slavery or human trafficking in any part of the business or its supply chain;
- Ensuring working hours are not excessive and are fully compliant with the Working Time Regulations 1998.

### **Our Response**

**GM FACILITIES** in accordance with section 54(1) of the Act will take all reasonable steps to ensure that its current suppliers have and will do so on an annual basis confirm that they have robust oversight of their operations and processes and can with sufficient confidence confirm that there are no risk of incidents of modern slavery or human trafficking. The firm will ensure that all new suppliers provide similar declarations as to current suppliers, before commencing any provision of services to the firm.

**GM FACILITIES** may terminate the business relationship with any supplier or clients which fails to provide an appropriate declaration or assurances that it has satisfactorily assessed its own risk of involvement in Modern Slavery.

### **Training**

To ensure a high level of the understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we ensure the relevant members of staff are aware of, understand and agree to our policy on Modern Slavery and Human Trafficking.

All Directors have been briefed on the subject.

### **Supplier Adherence**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Directors are responsible for compliance in their respective departments and for their supplier relationship.

### **Continual Improvement**

The Company will regularly review and develop its policies, procedures, systems and controls to ensure it remains committed to preventing slavery and human trafficking in any part of its business.

**GM FACILITIES** has not been informed of any incidents of slavery or human trafficking during the year, however, will investigate any allegations should they arise and take necessary action accordingly.

### **Director Approval**

This statement has been approved by the Company's Board of Directors, who will review and update the statement annually.

**Director: Lenne Moghadari**

**Date: 01 April 2021**

Signed *Lenne Moghadari*