ECOKLEEN GROUP LTD

HUMAN TRAFFICKING AND MODERN SLAVERY POLICY

Document Title	Document Owner	Issue / Version	Date of Issue
Human Trafficking and Modern Slavery Policy	Rob Miller, Director	Issue 1	22/04/2026
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22/04/2026	22/04/2027	Annual	Rob Miller

Version History

Issue	Date	Changes Made	Reviewed / Prepared By
Issue 1	22/04/2026	Initial issue.	Rob Miller

1. Policy Statement

Ecokleen Group Ltd is committed to conducting business ethically and responsibly and has a zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude and exploitation in any part of its operations or supply chain.

We are committed to acting with integrity in all business relationships and to implementing appropriate controls and procedures designed to prevent modern slavery and human trafficking.

This policy applies to all employees, workers, agency workers, contractors, subcontractors, suppliers and other persons working for or on behalf of Ecokleen Group Ltd.

2. Our Commitment

Ecokleen Group Ltd will not knowingly engage with any individual, organisation, supplier or subcontractor involved in modern slavery, forced labour or human trafficking. We are committed to:

- Providing fair and lawful employment.
- Ensuring employees have the legal right to work.
- Preventing forced, compulsory or trafficked labour.
- Ensuring workers are free to leave employment in accordance with their contractual terms.
- Not withholding passports, identity documents or personal possessions as a condition of employment.
- Not charging employees recruitment fees for obtaining employment with Ecokleen Group Ltd.
- Promoting fair treatment, dignity and respect in the workplace.
- Taking appropriate action where concerns regarding modern slavery or human trafficking are identified.
- Encouraging our suppliers and subcontractors to maintain equivalent ethical standards.

3. Recruitment and Employment Practices

Ecokleen Group Ltd recognises that responsible recruitment is an important safeguard against exploitation.

Our recruitment and employment practices are designed to ensure that individuals work voluntarily and under fair and lawful conditions. We will:

- Undertake appropriate right-to-work checks before employment commences.
- Provide employees with clear information regarding their employment terms and conditions.
- Seek to verify the legitimacy of recruitment agencies and labour providers used by the Company.
- Not knowingly use recruitment agencies or labour providers involved in exploitative practices.
- Ensure wages and employment arrangements comply with applicable UK legislation.
- Investigate any concerns relating to coercion, exploitation, intimidation or unlawful employment practices.

4. Supply Chain and Subcontractors

Ecokleen Group Ltd expects suppliers, contractors and subcontractors to conduct their businesses ethically and to comply with applicable legislation relating to modern slavery and human trafficking.

Where appropriate and proportionate to the nature of the supplier relationship, we may:

- Review supplier policies and working practices.
- Request confirmation of compliance with applicable modern slavery legislation.
- Seek information regarding employment and recruitment practices.
- Require concerns or suspected breaches to be investigated.
- Take appropriate remedial action where unacceptable practices are identified.

Where a serious breach is identified and appropriate corrective action is not taken, Ecokleen Group Ltd reserves the right to review or terminate the relevant business relationship.

5. Identifying Signs of Exploitation

Employees and managers should remain alert to indicators that an individual may be experiencing exploitation.

The presence of one indicator does not necessarily mean that modern slavery or trafficking is taking place, but concerns should be reported and investigated appropriately. Indicators may include:

- An individual appearing frightened, withdrawn or under another person's control.
- Someone being unable to provide or retain their own identification documents.
- Unusual restrictions on an individual's freedom of movement.
- Evidence that wages are being controlled or withheld by another person.
- Individuals appearing to be working excessive hours under coercive conditions.
- Workers appearing unable to communicate freely with managers or colleagues.
- Concerns regarding accommodation, transportation or recruitment arrangements.
- Evidence of threats, intimidation, abuse or coercion.

6. Reporting Concerns

Ecokleen Group Ltd encourages employees, workers and other stakeholders to report any genuine concern or suspicion relating to modern slavery or human trafficking.

Concerns should be raised with a line manager, senior manager or Director as appropriate.

Employees may also raise concerns through the Company's whistleblowing arrangements where applicable.

All concerns will be taken seriously and handled sensitively. No employee should suffer detrimental treatment for raising a genuine concern in good faith.

Where there is reason to believe that a criminal offence may have occurred, the matter may be referred to the appropriate authorities.

7. Training and Awareness

Relevant managers and employees will be made aware of the Company's commitment to preventing modern slavery and human trafficking.

Where appropriate, training and guidance will be provided to employees involved in recruitment, procurement, supplier management, subcontractor management and operational management.

The level of training will be proportionate to the risks associated with the individual's role.

8. Responsibility for the Policy

The Directors of Ecokleen Group Ltd have overall responsibility for this policy and for ensuring appropriate measures are in place to reduce the risk of modern slavery and human trafficking within the business.

Managers are responsible for promoting awareness of this policy and for escalating concerns where necessary.

All employees are expected to comply with this policy and report any suspected breach.

9. Breaches of this Policy

Any employee who breaches this policy may be subject to disciplinary action in accordance with Company procedures.

Where a supplier, contractor or subcontractor is found to have breached the principles of this policy, Ecokleen Group Ltd will consider appropriate corrective action, which may include termination of the business relationship in serious cases.

10. Monitoring and Review

Ecokleen Group Ltd will keep its approach to modern slavery and human trafficking under review and will update its procedures where appropriate.

This policy will be reviewed annually or sooner where there are significant changes to legislation, business operations or identified risks.

Signed:

Rob Miller

Position: Director

Date: 22/04/2026

Review Date: 22/04/2027