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|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy               | <b>Modern Slavery Statement</b>                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Purpose              | <b>This statement applies to KGB South West Ltd employees</b>                                                                                                                                                                                                                                                                                                                                                                                                        |
| Scope and definition | <p>The statement encompasses;</p> <ul style="list-style-type: none"> <li>• Human trafficking</li> <li>• Forced work, through mental or physical threat</li> <li>• Being owned or controlled by an employer through mental or physical abuse of the threat of abuse</li> <li>• Being dehumanised, treated as a commodity or being bought or sold as property</li> <li>• Being physically constrained or to have restriction placed on freedom of movement.</li> </ul> |
| Version              | V 1 - Nov 2020                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Amendment date       | V2 - May 2021                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                      | V3 - June 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

### Organisational Structure

The KGB South West Cleaning business operating structure consists of a Support Centre and three regions, our teams are based in schools and colleges within the areas as below;

- The Support Centre team are based from home and the support office in Milton Park, Abingdon.
- West Region are based within schools and colleges throughout Cornwall, Devon, Bristol and South Wales.
- Central Region is based within schools and colleges throughout Oxfordshire, Dorset and Berkshire.
- East Region is based in Central and Greater London schools and colleges.

There is a board of directors where People (HR), Finance, Support (IT), commercial and the operating team are represented.

### Activities

KGB South West Ltd is a cleaning service provider operating within the educational sector.

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 of 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 minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

## **Supply Chains**

In order to fulfil its activities, the main supply chains of the Organisation include those related to our cleaning business. We understand that the Organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

## **Potential Exposure**

In general, the Organisation considers its exposure to slavery/human trafficking to be extremely limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## 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 our 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

## Key Performance Indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- Quarterly review of our contracts and suppliers
- Reducing suppliers to a minimum in order to track performance

## Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

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

**Monitoring**

The effectiveness of the Modern Slavery statement will be monitored through data collection and the businesses commitment to our KPI's with reviews undertaken periodically.

| Function | Policy         | Amendment detail                | Date amended    |
|----------|----------------|---------------------------------|-----------------|
| People   | Modern Slavery | N/A                             |                 |
| People   | Modern Slavery | Reviewed                        | June 4th 2024   |
| People   | Modern Slavery | Reviewed and terminology update | August 5th 2025 |