



# Modern slavery policy V1.0

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## 1. Introduction

We take all forms of malpractice very seriously, whether it is committed by us, suppliers, agents or any other type of partner. This policy covers all operations and activities carried out by, or on behalf of, UPML.

## 2. Standards

Our culture is to be open, honest and straightforward with our clients, suppliers, partners and each other. We do not tolerate any form of Modern Slavery, not only because it is a criminal offence but also because it is unethical and dishonest. We have set out in this policy the minimum standards acceptable to our company. We ask that you take the time to read and understand this policy, which outlines what is expected of you, and that you take the necessary steps to:

- Ensure that workers are not being exploited, that they are safe and that relevant employment laws (including in relation to wages and working time), health & safety laws, human rights laws and international standards are adhered to, including freedom of movement and communications;
- Seek line manager advice if you are concerned that an instance of Modern Slavery might have occurred, or email a Company Director;
- Operate with honesty and integrity;
- Remember that Modern Slavery is a criminal offence;
- Report breaches of this policy, which can be done in confidence, to a Company Director;
- Act when you encounter activity that you consider may constitute a breach of this policy; and
- Avoid putting UPML in a compromising position.

### 3. What is modern slavery?

Modern slavery is a term that encompasses both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. It takes on many forms today and some of the key examples are as follows:

- Human Trafficking – described by the United Nations as the recruitment, transportation, transfer, harbouring or receipt of persons by improper means (such as force, abduction, fraud or coercion) for an improper purpose, including forced labour or sexual exploitation;
- Bonded Labour – also known as debt bondage and peonage, where a person is forced to work to pay off a debt;
- Child Slavery – any work deemed to be harmful to the health, safety or morals of a child (under 18) is child labour;
- Forced Marriage – where individuals don't have the option to refuse or are promised and married to another by their parents, guardians, relatives or other people and groups;
- Domestic Servitude – often a form of Bonded Labour, it covers the exploitation and control of someone providing live-in help (maids, servants, housekeepers, child-carers and those caring for the elderly are examples); and
- Forced Labour – where victims are made to work through violence and intimidation.

We all have a responsibility to act with honesty and integrity and the Policy is relevant to:

- Employees – all UPML employees (permanent and temporary);
- Suppliers – our suppliers, outsource partners, sub-contractors and consultants.

UPML employees are required to comply with this Policy. Failure to do so may constitute a criminal offence and will be considered to be gross misconduct, leading to disciplinary action up to and including summary dismissal. We also expect all our suppliers and partners to operate in a manner which does not conflict with this Policy and to respond to all reasonable requests for information that will allow UPML to fulfil its own obligations.

If suppliers or partners fail to comply with this Policy, it is likely to preclude them from maintaining their relationship with UPML and potential breaches may be reported to the relevant civil and criminal authorities. We expect all of our suppliers and partners to implement and maintain their own procedures designed to ensure their businesses and supply chains are free of Modern Slavery.

## 4. Reporting modern slavery

You must report any breaches of this Policy to your manager and email a Company Director. You don't have to fear that you will be harassed or bullied, lose out on opportunities or training, or face demotion or dismissal as a consequence of your concerns. In certain circumstances – for instance, if your concern becomes the subject of a criminal investigation – you may be needed as a witness; we will discuss this with you at the earliest opportunity.

At UPML we take ethical behaviour and legal compliance very seriously. If suppliers or outsource partners suspect there has been an instance of Modern Slavery within UPML or in one of our suppliers or outsource partner, those suspicions should be reported to us by emailing a Company Director. We expect suppliers and partners to notify us immediately of their concerns; they must not wait until after internal investigations have been concluded.

James Ingram

*James Ingram*

Managing Director

On Behalf of UniClean