

Anti-Slavery Policy

EXCELLERATE
SERVICES

WHERE **BETTER** BEGINS

Introduction to Excellerate Services UK

Our organisation is made up of brilliant people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. And we value our people for the differences they bring to the table. These differences - this diversity - is powerful. Fostering an inclusive culture helps each of us to benefit from a wider range of these different perspectives, experiences and skills. We believe that this creates a happier, more productive working environment for us all.

1. Purpose & Scope

To provide a clear and confidential process for making expectations clear and reinforcing fairness, consistency, and legal compliance, including:

- Prevent all forms of modern slavery and human trafficking within the organisation and its supply chains.
- Demonstrate the organisation's commitment to ethical conduct, human rights, and responsible business practices.
- Ensure compliance with the UK Modern Slavery Act 2015 and other relevant legislation.
- Provide clear expectations for employees, suppliers, contractors, and partners regarding the identification, reporting, and prevention of modern slavery.
- Promote transparency and accountability through due diligence, risk assessment, and continuous improvement activities.
- Protect vulnerable individuals by ensuring that no one working for or with the organisation is subjected to forced labour, exploitation, or coercion.

The scope defines where and to whom the policy applies:

- Applies to all employees, including permanent, temporary, agency, and contract workers across all business units and locations.
- Covers all third-party relationships, including suppliers, subcontractors, service providers, and business partners.
- Extends to all stages of the supply chain, from sourcing and procurement to service delivery and subcontracted operations.
- Includes all organisational activities, whether carried out directly or through controlled entities.
- Applies to recruitment, onboarding, labour practices, procurement, and supplier management, ensuring ethical standards are upheld throughout.

2. Policy Governance

- **Policy Owner:**
 - Head of Compliance & Risk (HCR)
 - Human Resources

- **Responsibilities:**
 - **Policy Owner** – Responsible for maintaining and updating the policy, ensuring alignment with the Modern Slavery Act 2015, ethical sourcing principles, and organisational standards.
 - **Executive Team** – Provides senior leadership oversight, ensures the policy supports the organisation’s values, and approves final versions.
 - **Compliance & Risk Team** – Reviews the policy for legal, regulatory, and ISO alignment; monitors adherence; supports due diligence; and drives continuous improvement.
 - **HR / People Team** – Ensures ethical recruitment practices, manages training, and supports investigations into suspected cases of modern slavery.
 - **Procurement and Supply Chain Teams** – Conduct supplier due diligence, monitor risk indicators, and ensure contractual commitments to anti-slavery standards.
 - **Managers and Supervisors** – Communicate the policy, identify potential risks, escalate concerns, and support reporting mechanisms.
 - **All Employees** – Expected to understand the policy, remain vigilant, and report any concerns or suspicions in good faith.

- **Oversight Body:**
 - Management Review Team
 - Head of Compliance & Risk
 - Director of People Services
 - Signed _____ off _____ by _____ CEO

- **Review Schedule:**
 - Annual review
 - Review log (with version control and sign-off by oversight body)

3. Commitment to Frameworks

- **Alignment with:**
 - Modern Slavery Act 2015 compliance
 - Human rights and ethical labour standards
 - Equality, Diversity, and Inclusion principles
 - ISO management system standards
 - Responsible procurement and supply chain governance
 - Data protection and confidentiality obligations
 - Whistleblowing and safe reporting mechanisms
 - Organisational values and code of conduct

4. Responsibility Matrix (RACI)

| Umbrella Policy | Overview Body | Responsible Person (s) | Informed |
|-----------------|---------------|--|--|
| Ethical Policy | HR | Head of Compliance & Risk – Director of People Services - CEO | All staff Customers Supply Chain |

5. Communication & Accessibility

- Published on:
 - External website
 - Internal intranet
 - Electronic Noticeboards
- Included in:
 - Annual compliance and refresher training
 - Management Review

Overview

Excellerate Services UK is a soft services provider which delivers cleaning & Security services to clients nationwide, employing a diverse workforce which consists of 88% foreign nationals. The Modern Slavery Act 2015 was introduced by the UK government to address slavery and human trafficking. Modern Slavery can occur in various forms including servitude, forced or compulsory labour and human traffic and can affect children and adults. This statement sets out Excellerate Services (ESUK) actions to understand all potential Modern Slavery risks related to its business and to put into place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during our financial year which runs from 1st July to 30th June annually. As part of the Cleaning and Security industries the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

The Organisation is subject to annual audits from various bodies, to ensure the highest standards of Health and Safety and wellbeing are maintained.

Definition

Excellerate Services consider that the Modern Slavery Act 2015 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.

Excellerate Services considers its exposure to slavery/human trafficking to be relatively limited, however, as a reputable organisation, we wish to play our part in stamping this practice out and, to that end, we have safeguards in place to ensure no person can be employed by us, or through one of our agents or suppliers, under such circumstances. These safeguards are described below.

Direct employees

In our Cleaning & Security services, employees are required to supply referees, proof of address, bank account verification and entitlement to work in the UK. Part of the proof of identity is the production of a current passport/ work permit. This document would normally be withheld by traffickers so its availability at interview would reassure us of the person's freedom.

Training is provided to all managers and supervisors to ensure that the documentation provided to verify a person's identification is authentic and not a forgery or stolen identification from a similar looking individual. We also use 'UComply' to verify the documentation.

Sub-contractors

The use of sub-contractors is the exception. In our cleaning services, sub-contractors must be reputable and holders of BS EN ISO 9001 accreditation. We judge that a company with this certification is highly unlikely to behave in a nature that would condone slavery or human trafficking.

Suppliers

The purchase of quality critical supplies and services may only be made through approved suppliers who have been verified and appointed to our Approved Suppliers List. Part of the verification process includes the completion of a statement to the effect that the supplier has robust employment measures in place and only sources their materials from known parties

Training

The Company will require all Senior and Front-Line Management to complete training on modern slavery as a module within the Company's wider human rights/ethics/ethical trade training programme.

The Company's modern slavery training will cover:

- how to assess the risk of slavery and human trafficking in relation to the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the HR Department.
- what external help is available.

Excellerate Services is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Due Diligence

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. To become an approved supplier, all candidates must undergo the outlined New Supplier processes. To promote good management of supply chains, supplier candidates are only approved if there is a clear business case for doing so; this prevents unnecessary dilutions of the core approved suppliers list. To complete the verification process, all supplier applications are reviewed by the Operations Director to ensure compliance with practices, and suitability to Excellerate Services and its customers.

The Company's due diligence and reviews include:

- mapping the supply chain to assess product risks of modern slavery.

- reviewing on a regular basis all aspects of the supply chain.
- conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Anti-Slavery Statement

Excellerate Services provides services to its clients via directly employed cleaning operatives, and a UK based contractor network. Excellerate Services fully supports the Modern Slavery Act 2015 and acknowledges its responsibilities in relation to tackling modern slavery.

Excellerate Services understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Excellerate Services does not enter into business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

We carry out thorough due diligence on all our major supply chain partners and will for any new major contractor or supplier take steps to ensure confirmation of their compliance with the Act.



Johan Venter, Group CEO UK & Ireland

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