CITY & ESSEX

2026

Modern Slavery & Human Rights **Policy**

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1. MISSION STATEMENT

City & Essex is committed to respecting human rights and preventing modern slavery, human trafficking, forced labour, child labour and exploitation in our own operations and supply chain.

This policy sets out our approach to identifying, preventing, reporting and responding to modern slavery and human rights risks. It updates and strengthens the previous Modern Slavery Policy while retaining City & Essex's zero-tolerance position and commitment to ethical, transparent and responsible business practice.

City & Essex recognises that cleaning, facilities services and associated supply chains may involve vulnerable workers, subcontracted labour, agency labour, site-based workforces, migrant workers and employees whose first language may not be English. We therefore seek to make reporting routes, worker protections and supplier expectations clear, accessible and consistently applied.

2. SCOPE

This policy applies to City & Essex Limited and all affiliated subsidiaries. It applies to employees, workers, agency workers, apprentices, directors, officers, contractors, consultants, subcontractors, suppliers and business partners working for, with or on behalf of City & Essex, where relevant to their role or contractual relationship.

- Direct employees and site-based cleaning teams.
- Supervisors, managers, HR, procurement, commercial and operational teams.
- Agency workers, temporary workers and subcontracted labour where used.
- Suppliers and partners providing goods, equipment, consumables, chemicals, uniforms, waste services, pest control, sanitary services, subcontracted services or other business-critical services.
- Client sites, Head Office operations and supply chain relationships where City & Essex has control, influence or procurement responsibility.

Where City & Essex operates on client-controlled sites, we will work with clients, suppliers and subcontractors to uphold this policy and respond appropriately to any concerns raised.

3. RELATIONSHIP WITH EXISTING POLICY

This policy updates and replaces the previous Modern Slavery Policy v5.1 as City & Essex's top-level Modern Slavery and Human Rights Policy, subject to final internal approval.

Detailed HR policies, whistleblowing procedures, recruitment controls, right-to-work processes, supplier onboarding documents, Supplier Code of Conduct, Sustainable Procurement Policy and operational procedures remain in force unless separately updated.

4. FRAMEWORKS & LEGISLATION

TThis policy is informed by applicable UK legislation, labour standards and human rights principles, including where relevant:

- Modern Slavery Act 2015.
- Human Rights Act 1998.
- Employment Rights Act 1996 and related UK worker protections.
- Equality Act 2010.
- Health and Safety at Work etc. Act 1974, where worker safety and wellbeing are relevant.
- Immigration, Asylum and Nationality Act 2006 and related right-to-work requirements.
- ILO Core Conventions, including C029 Forced Labour, C105 Abolition of Forced Labour, C138 Minimum Age and C182 Worst Forms of Child Labour.
- UN Guiding Principles on Business and Human Rights.
- The Employer Pays Principle, which states that recruitment costs should not be borne by workers.
- City & Essex Supplier Code of Conduct and Sustainable Procurement Policy.

5. POLICY COMMITMENTS

1. Zero Tolerance of Modern Slavery and Exploitation

City & Essex has a zero-tolerance approach to modern slavery, human trafficking, forced labour, bonded labour, debt bondage, child labour and any form of worker exploitation. We are committed to acting ethically, transparently and with integrity in our own operations and supply chain.

We expect the same high standards from suppliers, contractors, subcontractors, consultants, agencies and other business partners.

2. Respect for Human Rights and Fair Treatment

City & Essex is committed to treating people with dignity and respect. We will not knowingly tolerate forced labour, coercion, intimidation, violence, restriction of movement, withholding of identity documents, illegal wage deductions, excessive recruitment fees, discrimination, harassment, unsafe working conditions or denial of basic employment rights.

Workers should be free to leave employment in accordance with applicable law and contract terms. Workers should have access to clear information about their role, pay, working conditions, reporting routes and rights.

3. Recruitment, Right to Work and Labour Agency Controls

City & Essex will maintain appropriate recruitment, onboarding and right-to-work checks in line with UK legal requirements. Where employment agencies or labour providers are used, City & Essex will seek to use reputable providers and verify their practices before accepting workers from them.

City & Essex will not knowingly use labour providers that charge workers recruitment fees, unlawfully withhold wages, restrict worker movement, withhold identity documents or use coercive employment practices.

4. Migrant Workers and Language Accessibility

City & Essex recognises that some workers may be more vulnerable to exploitation due to language barriers, immigration status, limited understanding of UK employment rights, isolation, economic pressure or dependence on third parties.

We will make key reporting routes, worker protections and support mechanisms accessible to employees and workers, including site-based employees and employees whose first language is not English. Managers should use appropriate communication methods to help workers understand how to raise concerns safely, and the need for translated guidance will be reviewed as part of the 2026 accessibility review.

5. Young Workers and Child Labour

City & Essex will not employ children or knowingly allow child labour within its operations or supply chain. Where young workers are legally employed, they must be protected in line with applicable law, including restrictions on working time, hazardous work and safeguarding requirements.

Suppliers and subcontractors must not use child labour and must comply with legal minimum age requirements and relevant ILO principles.

6. Supplier and Subcontractor Expectations

City & Essex expects suppliers, subcontractors and business partners to uphold ethical labour practices and to take reasonable steps to prevent modern slavery and human rights abuses in their own operations and supply chains.

Supplier expectations are communicated through the Supplier Code of Conduct, Sustainable Procurement Policy, supplier onboarding, supply chain engagement and relevant contractual or review processes. Where concerns are identified, City & Essex may request further information, improvement actions, evidence of controls or corrective action plans.

7. Reporting Concerns and Whistleblowing

Employees, workers, suppliers and other stakeholders are encouraged to raise any concern or suspicion relating to modern slavery, human trafficking, forced labour, exploitation or human rights abuse as early as possible.

Concerns may be raised through line managers, HR, senior management, the Whistleblowing Procedure, grievance routes or other reporting channels made available by City & Essex. Concerns may also be raised through the UK Modern Slavery Helpline on 0800 0121 700 where appropriate.

City & Essex will treat concerns seriously, sensitively and, where possible, confidentially. Retaliation, victimisation or detrimental treatment of anyone who raises a genuine concern in good faith will not be tolerated.

8. Investigation, Remediation and Corrective Action

Where a concern is raised, City & Essex will assess the matter and take appropriate action based on the nature and seriousness of the concern. This may include internal review, supplier engagement, escalation to senior management, corrective action, suspension of activity, notification to authorities or termination of a commercial relationship where appropriate.

Where a worker may be at risk of harm, City & Essex will seek to prioritise safety, confidentiality and appropriate support, while recognising that some issues may require specialist advice or referral to relevant authorities.

9. Training, Awareness and Communication

City & Essex will communicate modern slavery and human rights expectations to relevant employees, managers, supervisors and suppliers. Training, awareness or communications may be delivered through induction, HR systems, supplier engagement, online learning, management briefings or targeted communications where relevant.

6. TARGETS AND MEASUREMENT

City & Essex will use 2024 as its ESG baseline year unless a more specific baseline is stated.

Area	Baseline/Context	Target	Deadline
Training	Modern slavery awareness is managed through HR, HSEQ, procurement and training systems where relevant	Relevant managers, supervisors, HR, procurement and supplier-facing colleagues will complete or be assigned modern slavery awareness training or guidance	End 2026
Supplier Code	Supplier Code of Conduct created in 2026, with Supply Chain Charter evidence retained as transition evidence	Issue Supplier Code of Conduct to strategic suppliers and track acknowledgements through the Supplier Code Register	End 2026

Area	Baseline/Context	Target	Deadline
Recruitment fees	Employer Pays Principle included in policy	Maintain prohibition on knowingly using labour providers that charge recruitment fees to workers	Ongoing
Accessibility	Cleaning workforce includes employees with varied first languages	Review accessibility of key reporting routes, including whether translated guidance is required for employees whose first language is not English	End 2026
Annual review	Modern Slavery Policy v5.1 expanded into this wider human rights version	Review this policy annually, update supplier due diligence requirements where required and review accessibility of reporting routes for employees whose first language is not English	Annual

7. RESPONSIBILITIES

Managing Director

The Managing Director has ultimate accountability for this policy and for ensuring that modern slavery and human rights expectations remain part of City & Essex's responsible business approach.

Head of ESG

The Head of ESG is the policy owner and is responsible for maintaining this policy, coordinating EcoVadis evidence where relevant, supporting supplier due diligence, aligning the policy with ESG reporting and working with internal teams to improve modern slavery and human rights controls.

Head of People & Culture

The Head of People & Culture supports this policy through recruitment, onboarding, employee communication, grievance processes, worker support, HR controls and access to reporting routes.
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Head of HSEQ
The Head of HSEQ supports this policy where health, safety, wellbeing, site controls, contractor management and worker protection intersect with HSEQ responsibilities.

Procurement, Commercial and Finance Teams
Relevant procurement, commercial and finance colleagues support this policy by helping identify strategic suppliers, maintaining supplier records, requesting supplier evidence and ensuring supplier expectations are considered in procurement and contract management where appropriate.

Operations Managers, Site Managers and Supervisors
Operations Managers, Site Managers and Supervisors are responsible for remaining alert to potential signs of worker exploitation, supporting site-based employees, escalating concerns and ensuring workers know how to raise concerns safely.

Employees, Workers and Subcontractors
Employees, workers and subcontractors are expected to comply with this policy, treat others with dignity and respect, avoid any activity that may lead to a breach of this policy and report concerns in good faith.

Suppliers and Business Partners
Suppliers and business partners are expected to uphold human rights, prevent modern slavery and cooperate with reasonable information requests, supplier reviews and corrective actions where relevant.

8. SUPPORTING PROCEDURES & EVIDENCE

This policy sets out City & Essex's overarching commitments, responsibilities and objectives. It is supported by relevant HR policies, recruitment controls, supplier documents, reporting routes, training records, management review, client requirements and statutory obligations. Supporting documents and evidence may include:

- Whistleblowing Procedure.
- Supplier Code of Conduct.
- Sustainable Procurement Policy.
- Supplier Code Acknowledgement Register and signed supplier charter evidence.
- Working Conditions, Wages & Employee Voice Policy.
- Equality, Diversity, Inclusion & Anti-Harassment Policy.
- Modern Slavery & Human Rights Policy.
- Recruitment, onboarding and right-to-work records, where appropriate.
- Agency labour or subcontractor due diligence records, where applicable.
- Training, awareness and supplier engagement records.
- Concerns, complaints, whistleblowing, grievance or corrective action records where available and appropriate.

These supporting documents provide the detailed controls used to implement this policy in day-to-day operations.

9. REPORTING AND REVIEW

This policy will be reviewed annually, or sooner where required by legislation, client requirements, EcoVadis reassessment, material operational changes, supplier risk findings, significant concerns or changes to reporting arrangements.

Modern slavery and human rights performance will be reviewed through relevant HR processes, supplier engagement, procurement review, ESG evidence review, whistleblowing or grievance records where appropriate, and management review where issues or trends require escalation.

Business Name: **City & Essex Ltd**
Approved and Signed By: **Ian Hookway, Managing Director**
Approval Date: **October 2026**

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