

## **Modern Day Slavery, Human Trafficking & illegal Workers Policy**

### **BMS-POL-14**

Hydro Cleansing Limited (HCL) is committed to driving out acts of modern-day slavery, human trafficking and illegal working within its business and that from within its supply chains, sub-contractors (if and when used) and partners.

HCL recognizes that slavery, human trafficking, and illegal workers remain a concern throughout today's society and acknowledge responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

HCL's Directors and senior management will take responsibility for implementing this policy statement and its objectives, whilst providing adequate resources including training, to ensure that slavery and human trafficking is not taking place within the organisation, or its supply chain.

HCL will achieve these aims by our initiative to identify and mitigate risk in the following ways (but not limited to):

- Employee training to establish understanding of requirements,
- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.) by way of Pre-Qualifying Questionnaires and Audits if necessary.
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work.
- We encourage the reporting of concerns and the protection of whistleblowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

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We will use the following methods to measure how effective we have been to ensure that slavery, human trafficking, and the use of illegal workers is not taking place in any part of our business or supply chains:

- Completion of internal Audits.
- Use of labour monitoring and payroll systems.
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.
- Annual Senior Management review.

### **Employment due diligence checks (Right to Work)**

Hydro Cleansing Limited carry out appropriate VISA, Passport and DOB checks to ensure all employees are entitled to work in the UK in accordance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006.

Employees are required to supply a 'Right to work share code' to prove the right to work in the UK if they are not a British or Irish citizen, prior to the commencement of employment.

Should a non-UK resident apply to work with us, a copy of their work visa, passport and/or a 'Right to work share code' would be required. All necessary checks would then be made to ensure the person has the right to work in the UK and they have no immigration restrictions that prevent them from doing the work in question.

Should a potential employees' right to work in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment.

## Supplier Approvals

As part of HCL's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources outside the UK and EU are potentially more at risk from slavery and human trafficking issues. The level of management control required for these sources will be continually monitored.

HCL will not support or deal with businesses knowingly involved in slavery or human trafficking.

Hydro Cleansing Limited will undertake due diligence when considering taking on new suppliers and regularly review its existing suppliers. This includes building of long-standing relationships with suppliers and making clear our expectations of our business partners.

This policy supports the policies, procedures and requirements documented and are compliant with our ISO 9001:2015, ISO 14001:2015 and in-line with ISO 45001:2018.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached.

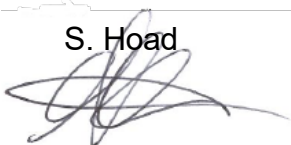
This Policy Statement will be briefed to all employees upon commencement of employment within the induction process and whenever it is revised. A copy of the Policy and the Modern Slavery Act 2015 will be displayed prominently at HCL offices and made available upon request and will be accessible to all employees.

The Management will monitor the operation of this Policy to encourage and strive for continual improvements and performance as an ongoing action.

The policy statement will be review annually, amended as required and published annually.

As Managing Director of Hydro Cleansing Ltd I will ensure that this policy is implemented and reviewed as necessary or on an annual basis.

S. Hoad



Managing Director  
Dated: 14/05/2025