



MODERN SLAVERY STATEMENT

A. ORGANISATION

This statement applies to Prox EcoClean Limited (referred to in this statement as ‘the Organisation’).

The information included in the statement refers to the financial year to August 2025.

B. ORGANISATIONAL STRUCTURE

The Organisation is a private limited company that primarily operates on its clients’ sites, delivering professional cleaning and associated support services. These services include directly supplied activities such as office and general cleaning, where labour is employed directly by the Organisation, as well as specialist services that are subcontracted to professional third-party providers who employ their own workforce. Examples of subcontracted services include specialist window cleaning and waste management.

Demand for the Organisation’s services remains consistently high, with continued growth anticipated. While there may be fluctuations linked to the award, retention, or loss of contracts, these variations are not influenced by seasonal factors.

The Organisation is governed by an Executive Company Director holding the title of Managing Director.

Key functional areas are overseen by Directors responsible for Finance, Commercial, Operations, and Human Resources. Reporting to these Directors are managers and employees who carry out defined roles within their respective departments.

All activities are centrally administered and coordinated from the Head Office, located in Sunderland and Doncaster, where the majority of support functions are based.

Operational delivery is managed by structured teams responsible for organising, controlling, and fulfilling client contractual requirements.

These teams are typically led by a Senior Operations Manager or Account Manager, both of whom report directly to the Managing Director. Reporting to the Senior Operations Managers are Site or Area Managers, supported in turn by Site or Area Supervisors.

The workforce engaged in delivering the Organisation’s services operates predominantly across Sunderland, the North East, and wider Home Counties. The Organisation operates exclusively within the United Kingdom.

DEFINITIONS

The Group 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

D. 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 Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employee.

E. SUPPLY CHAINS

To support the delivery of its operations, the Organisation's primary supply chains relate to the procurement of cleaning materials, equipment, and machinery from a range of suppliers based within the United Kingdom. The Organisation recognises that its first-tier suppliers often operate as intermediary traders and, as such, maintain contractual relationships with lower-tier suppliers.

However, the Organisation requires all first-tier suppliers to formally agree to and comply with its Ethical Purchasing Policy as a condition of inclusion on the Approved Supplier List and prior to the commencement of any supply of goods.

F. POTENTIAL EXPOSURE

The Organisation considers its primary exposure to the risk of slavery and human trafficking to arise within its clothing supply chains, as these may involve the provision of labour in countries where protections against human rights abuses may be limited.

Overall, the Organisation assesses its exposure to the risks of slavery and human trafficking as relatively low. Nevertheless, it has implemented measures to ensure that such practices do not occur within its own operations or within the operations of any organisation that supplies goods and/or services to it.



G. 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:

- ensuring suppliers agree to and endorse the Prox EcoClean Ethical Purchasing Policy.
- reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- ensuring that the Organisation's recruitment policies and procedures include a zero tolerance towards any sign of potential modern slavery.

H. 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.

- Supplier performance is reviewed to assess compliance with the Ethical Purchasing Policy and Approved Supplier criteria. This is undertaken through Supplier Appraisal Questionnaires, which are completed on an annual basis.
- The effectiveness of the Recruitment Policy is also reviewed, including an assessment of the countries of origin of employees. This review considers any potential risks associated with modern slavery and evaluates whether concerns may arise from particular regions.

I. POLICIES

The Organisation has the following policies which further define its stance on modern slavery:

- modern slavery policy
- human rights policy
- business ethics policy
- ethical purchasing policy
- corporate social responsibility policy
- recruitment policy

These policies are available to view at any time upon request

Modern Slavery Statement

J. 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 obligations in this regard.

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