



# Modern Slavery Policy

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3 Way Cleaning Ltd, Unit 7, Capstan Centre, Tilbury, Essex, RM18 7HH, Registered in England: 3457928, VAT: 940 4159 37



## Control sheet

Title	Modern Slavery Policy
Purpose	To clearly set guidelines and define the 3Way code of conduct in respect to the Environment, Health & Safety, Customers, Employees, Communities and Suppliers.
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## Distribution list

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## References and related documents

🔗 Employee handbook

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## 1. MODERN SLAVERY STATEMENT

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that 3Way has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. 3Way has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our business

At 3Way, we believe that it is not a responsibility, but our duty to perform in a fair and ethical manner. Our company not only has a culture, it has a conscience, in which we conduct every aspect of our business with honesty, openness and dignity. We have a strong commitment to the community, and actively seek out ways in which we can help charitable organisations. Our principles, established over the past 30 years, are a major contributor to 3Way's continuing success.

Our ambition, to be the Superior Support Service provider, is based on excellent service provided by outstanding people.

### Our high risk areas

Our high risk areas lie with our suppliers and sub-contractors, as we are a Living Wage Supplier. We can mitigate this risk by adding a section to our sub-contractor questionnaire, ensuring that all sub-contractors and suppliers have their own Modern Slavery policies in place. For 3Way employees, our strict recruitment guidelines ensure that we only recruit the best applicants, and once in place our employee tracking software ensures that only these employees can be on site.

## 2. OUR POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- ☞ **Anti-bribery and corruption policy** – This policy outlines 3Way's stance on accepting and giving bribes.
- ☞ **Bullying and harassment policy** – This policy outlines 3Way's zero tolerance on bullying and harassment in the workplace.

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- ❧ **Equal opportunities policy** – This policy outlines 3Way's commitment to an equal and diverse workforce.
- ❧ **Training and development policy** – This policy outlines 3Way's commitment to train and develop its workforce.
- ❧ **Young person's policy** – This policy ensures that young people are able to work safely within the workplace.
- ❧ **Anti-slavery policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- ❧ **Privacy Statement** – This states how we collect and treat personal information, and how it is stored.

### 3. OUR SUPPLIERS

3Way operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- ❧ They have taken steps to eradicate modern slavery within their business
- ❧ They hold their own suppliers to account over modern slavery
- ❧ They pay their employees at least the national minimum wage
- ❧ We may terminate the contract at any time should any instances of modern slavery come to light

### 4. TRAINING

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. Our Area Supervisors conduct regular audits of our contracts to ensure that the correct level of service and the correct screened employees are being provided.

### 5. OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain. No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.