



Modern Slavery Statement



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Modern Slavery and Human Trafficking Statement

Harrow Business Services Ltd (HBS) is committed to improving its practices to combat slavery and human trafficking. To ensure the continued effectiveness of our anti-slavery and human trafficking measures, we periodically undertake an assessment and review of our processes and regularly seek assurances from suppliers and their supply chains comply with the Modern Slavery Act 2015 and Human Rights Act 1998.

Organisation structure and business

HBS is headquartered in Colchester and has 30 employees in different locations across the UK. We provide educational supplies and hygiene products to schools and colleges throughout the UK.

Anti-slavery and human trafficking

We are committed to ensuring that there is no Modern Slavery or human trafficking in our supply chain or in any part of our business. Our Anti-slavery and Human Trafficking Statement reflects our commitment to acting ethically and with integrity in all our business relationships and our effort in implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place.

Furthermore, we only work with suppliers that are compliant with the eight fundamental ILO (International Labour Organisation) conventions:

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87),
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98),
- Forced Labour Convention, 1930 (No. 29),
- Abolition of Forced Labour Convention, 1957 (No. 105),
- Minimum Age Convention, 1973 (No. 138),
- Worst Forms of Child Labour Convention, 1999 (No. 182),
- Equal Remuneration Convention, 1951 (No. 100),
- Discrimination (Employment and Occupation Convention, 1958 (No. 111).

Our global production supply chain

We are one of the UK's leading suppliers of educational supplies, serving more than 2,000 schools across the UK. With over 20,000 product lines we have a very extensive global supply chain. We manage this supply chain with robust processes, procedures, and audits to ensure that the products that we supply are ethically and sustainably produced.

In our contracts with third party suppliers, we have introduced provisions to provide assurances from suppliers that Modern Slavery does not take place within their business or their supply chains.

Moreover, we work in close collaboration with our suppliers, assessing their working practices and educating them on our zero tolerance to any form of Modern Slavery or unethical employment practices. To back up this collaborative approach, our Senior Management team periodically



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monitors our suppliers to establish their continued commitment to fair work practices and compliance with key legislations, such as The Health and Safety at Work Act (1974).

Should any supplier be found to use Modern Slavery in their business or in any part of their supply chain we will report them to the relevant authorities both here and in their country of operation and will terminate the contract with immediate effect.

Our global logistics supply chain

HBS takes the approach that Modern Slavery does not stop at the factory gate. Logistics and shipping are often overlooked, but the risks for shipping workers can be as great as those for a factory worker. Subsequently, we have extended our oversight to include the transport of the goods and mitigate the risks involved by using the larger shipping lines that have published modern slavery programmes in place.

Our UK Facilities

We have conducted 'eligibility to work in the UK' checks for all candidates to negate the risks of Modern Slavery or forced labour and ensure everyone employed is aged 16 and above. We have required all candidates to produce a passport and have made all candidates aware of their contractual and statutory employment rights.

Our staff are aware of what Modern Slavery means, why it is illegal in the UK, and what they need to do if they know or spot a victim. We ensure that all our temporary workers know that we will fully support them if the need arises, and that we will provide a safe space for them.

HBS understands that the UK contract cleaning sector is high-risk. As such, we have made thorough assessments to ensure our facilities and cleaning suppliers mitigate the risk of Modern Slavery and remunerate staff fairly before doing business with them.

Whistleblowing

Our Whistleblowing Policy ensures we have procedures in place for HBS employees, customers, and suppliers to disclose any concerns regarding our supply chains. We actively encourage all parties to report any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

This procedure is highlighted to all HBS staff as part of our induction process.

Training and capacity building

To ensure a high level of understanding of the risks of Modern Slavery and human trafficking in our supply chains and our business, we provide awareness training to those of our employees who have responsibility in relation to engaging suppliers.

We ensure that employees with responsibility for conducting interviews understand and can recognise signs that Modern Slavery may be occurring. These include, but are not limited to:

- Distrust of authorities,
- The appearance of acting on instruction,



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- Injuries, the apparent cause of which is assault or the exertion of control,
- Lack of ability to produce passports/documents held by someone else,
- No knowledge of home or work address,
- Lack of access to medical care,
- Money deducted from salary,
- Limited access to bathroom/hygiene facilities,
- Repeating stories,
- Signs of blackmail or intimidation.

Signature

This statement was signed by Harrow Business Services Ltd Managing Director and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st December 2023.

Signature:

Tim Doouss

Group CEO

Date: 2nd January 2023