

Modern Slavery & Human Trafficking Policy

Autoclenz Group

1. Policy Statement

The Autoclenz Group is fully committed to complying with all applicable UK legislation, including the Modern Slavery Act 2015. We maintain a zero-tolerance approach to modern slavery, human trafficking, forced labour, and all forms of hidden labour exploitation within our operations and supply chain. We ensure that our policies, systems, and behaviours reflect our commitment to legal compliance, ethical conduct, and protection of vulnerable workers.

2. Scope

This policy applies to all employees, workers, subcontractors, agency workers, labour providers, suppliers, and all third-party personnel working within or on behalf of Autoclenz across all operational environments.

3. Leadership, Accountability & Governance

Board-level oversight ensures governance and accountability for tackling modern slavery. Key roles include:

- Modern Slavery Lead (Trevor Clingo) – strategy, escalation and oversight.
- CEO (Martin Ward) – responsible for ensuring labour standards and cost transparency.
- SHEQ Consultant (John Watson) – supply chain risk assessments and audits.
- HR and Compliance Officer (Jenny White) – training, awareness, reporting systems and KPIs.
- Regional Operations Managers and Heads of Business – subcontractor and site-level compliance.

A Modern Slavery Working Group meets quarterly to review risks, data, improvements and progress.

4. Our Commitments

Autoclenz is committed to working towards and ensuring:

- Ethical Employment & Recruitment: applying the Employer Pays Principle, prohibiting recruitment fees, document retention, compulsory overtime or coercive practices.
- Preventing Hidden Labour Exploitation: proactive controls, multilingual worker communication, and workforce awareness training.
- Safe & Transparent Supply Chains: due diligence checks, Supplier Compliance Declarations, regular audits, and improvement plans or termination for non-compliance.
- Training & Awareness: mandatory training for managers, recruiters, team leaders, frontline workers and Modern Slavery Champions.



AN ALLIANCE TO ENSURE A GREATER CUSTOMER EXPERIENCE

Valeting

Eco Shine

Eco Shine
Facilities
Management

Driven
Logistics

Valet+

Cosmetic
Repair

AC-Zap

Unique Van
Lining &
Accessories

Modern Slavery & Human Trafficking Policy

Autoclenz Group

5. Risk Assessment (Saliency-Based Method)

Autoclenz uses a saliency-based approach to identify and prioritise the most prominent and significant risks of modern slavery within our operations and supply chain. This method considers issues that are particularly relevant to our sector, workforce, supply chain structure, and organisational activities. Key considerations include:

- i. Issues such as recruitment transparency and ensuring wages and benefits are paid fairly and properly.
- ii. Particular worker migration routes considered to be higher risk for labour trafficking and/or unethical recruitment practices.
- iii. Use of labour providers, recruiters, contractors and sub-contractors.
- iv. Issues posing significant reputational risk.

Risk assessments are reviewed regularly and wherever possible involve engagement with the Modern Slavery Working Group, workers, suppliers, and other key rights holders and influencing stakeholders to ensure an informed and people-centred approach.

6. Grievance, Reporting & Whistleblowing Procedures

Autoclenz provides safe, confidential, multilingual channels for all workers - including subcontractors, agency workers, and third-party staff - to raise concerns related to modern slavery. Reporting routes include:

- The Modern Slavery Lead (trevor.clingo@autoclenz.co.uk)
- Modern Slavery Helpline - 0800 0121 700
- Team Leader or Regional Operations Manager

Autoclenz prohibits retaliation against anyone raising a concern in good faith. All grievance and whistleblowing mechanisms are accessible, confidential and communicated across multiple languages and sites.

7. Response Plan & Victim Support

If a potential case arises, Autoclenz Group follows a structured Response Plan ensuring victim safety, evidence protection and legal escalation.

Escalation routes include police (999/101)
GLAA (0800 432 0804)
Modern Slavery Helpline (0800 0121 700)

Trusted independent interpreters such as Clear Voice will be used when required.



AN ALLIANCE TO ENSURE A GREATER CUSTOMER EXPERIENCE

Valeting

Eco Shine

Eco Shine
Facilities
Management

Driven
Logistics

Valet+

Cosmetic
Repair

AC-Zap

Unique Van
Lining &
Accessories

Modern Slavery & Human Trafficking Policy

Autoclenz Group

8. Monitoring, KPIs & Continuous Improvement

We track training completion rates, supplier audit outcomes, concerns raised, remediation actions and supply chain compliance.

Annual reviews ensure continual improvement.

A formal Modern Slavery Statement is published each year.

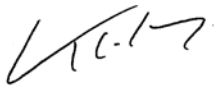
9. Communication & Transparency

This policy is available in multiple languages, shared with suppliers, embedded in contractual requirements, and published on the Autoclenz website.

Ongoing communication ensures awareness across the organisation and supply chain.

10. Review

This policy will be reviewed annually or sooner if legislation, risks or organisational needs change.



Approved by: Trevor Clingo - Board Director (Modern Slavery Board Level Lead)

April 2026



AN ALLIANCE TO ENSURE A GREATER CUSTOMER EXPERIENCE

Valeting

Eco Shine

Eco Shine
Facilities
Management

Driven
Logistics

Valet+

Cosmetic
Repair

AC-Zap

Unique Van
Lining &
Accessories