



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Introduction

This statement sets out Leading Environmental Solutions Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2025/2026.

The Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

The Company provides FM solutions to commercial clients across the United Kingdom. Our aim is to provide the highest levels of client service in an industry which is notorious for failing to live up to client expectation. Our staff are highly trained professionals who are working with the best technology and equipment available on the market.

Countries of Operation and Supply

The Company currently operates wholly in the UK. The Company understands that its first-tier suppliers could be intermediary traders and therefore have further relationships with lower-tier suppliers.

High-Risk Activities

The Company considers that its main exposure to the risk of slavery and human trafficking exists because they can involve the provision of labour in countries where protection against breaches of human rights may be limited.

Responsibility

The Company carries out due diligence processes in relation to ensuring that slavery and/or human trafficking does not take place in its organisation or supply chains, including a review of the control of its suppliers. The Company 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 the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:

- reviewed supplier contracts to include termination powers in the event that the supplier is, or is suspected to be involved in modern slavery; and
- notified its supply chain of our zero-tolerance policy towards modern slavery.

Relevant Policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy** - The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Anti-Bribery Policy** - The Company prohibits any form of bribery. It requires compliance from everyone connected with its business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of the utmost importance and the Company takes a zero-tolerance approach towards corrupt activities of any kind, whether committed by the Company or by third parties acting on its behalf.
- **Code of conduct** - The Company is committed to ensuring that its suppliers and staff adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Company's code of conduct will lead to the termination of the business relationship.
- **Recruitment / Agency workers policy** - the Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain;
- conducting assessments in situations where a greater degree of focus on slavery and human trafficking risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance Indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- developing a system for supply chain verification whereby the Company evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the Company evaluates all existing suppliers.

Child Labour

The Company will ensure that all relevant legislation and restrictions are adhered to with regards to the use of young workers. It will ensure that the necessary checks are carried out to verify an individual's age and right to work and that the relevant health & safety codes are adhered to.

Where required, the Company will ensure that a relevant employment permit is received from the education department of the local council.

It will also carry out spot checks when required and will retain copies of age records within the place of work.

Training and Compliance

The Company requires its external HR consultants to undertake training on modern slavery.

The Company has nominated Leon Seabrook, Director, to be the Slavery Compliance Officer.

Board approval

This statement has been approved by the Company's Board of Directors, who will review and update it annually.

Director's Signature:	<i>Leon Seabrook</i>
Director's Name:	Leon Seabrook
Date:	10/10/25