



Key Enviro Solutions | Modern Slavery Statement

Modern slavery is a growing concern globally. The data tells us that the numbers of people suffering from this terrible crime is increasing by 20% every 4 years which has seen published figures of 50 million people that are now held in modern slavery conditions worldwide.

2022 saw the fallout of the Covid pandemic and political unrest meaning mass human migration which allows criminals to manipulate people's needs and fears and the result are that this crime only becomes more prevalent but further underground.

Key Enviro Solutions Limited are an ethical business with integrity and this runs through our entire organisation to our front-line workers. Our approach to business is informed by our Values: Care, Safety, Trustworthy and Expert. These Values underpin the decisions we take, guide us to do the right thing, and they inform the approach Key Enviro Solutions is taking to modern slavery. Our commitment is both clear and achievable -to eradicate modern slavery and human trafficking within both our business and our supply chains, within the UK and overseas.

Care	Safety	Trustworthy	Experts
We take care of you	We act safely & responsibly	We are trustworthy	We work as experts

This Statement sets out our progress in the last year and the structures built to enable Key Enviro Solutions to achieve our goals. We commit to continue to evolve our processes to ensure we are doing everything we can to remove modern slavery from our world and to raise the exposure to this subject at every point because it is the right thing to do.

Paul Openibo
M.D, Key Enviro Solutions Limited – UK
June 2023

About this Statement - This Statement has been published in accordance with the Modern Slavery Act 2015. The Statement sets out the approach being taken by Key Enviro Solutions Limited (KES) to prevent the risk of modern slavery and human trafficking in its businesses and across the supply chain.



It is our absolute priority
ensuring that modern slavery
becomes a thing of the past.

Key Enviro Solutions Structure, Business and Supply Chains

Key Enviro Solutions are a forward-thinking leader in facilities management, providing a full range of crucial services to our clients in the UK.

Key Enviro Solutions has supported businesses since our inception in 2012, from a small family-owned window cleaning service to a highly respected blue-chip business, providing multiple services in partnership with our clients across a range of sectors, from offices and shopping malls to manufacturing facilities, data centres, and restaurants.

Our dedicated team of cleaners, technicians, and service partner experts provide specialist and sustainable solutions that enhance the businesses of our clients every day.



To fulfil our obligations to our clients, we procure goods and services from a wide range of suppliers. We complete all necessary due diligence with our service partners / suppliers and ensure we continue to review processes in place to ensure that Modern Slavery is not occurring in any tier of our supply chain.

In 2022, we concluded an unannounced check of our service partners companies.

Leadership and Governance

KES continues its work in Anti-Slavery headed by the Anti-Slavery Committee which is Board lead and includes business leaders from across KES, reporting into the Executive Leadership Team.

The Committee works to the KES Modern Slavery Action Plan, which was informed by the global gap analysis completed on KES by the Slave Free Alliance and includes elements ranging from training to recruitment.

The committee looks at current risks to the business and trends in the modern slavery landscape and works with the operational business to implement processes to remove the risk to our business and our stakeholders.

Our Policies on slavery and human trafficking

Key Enviro Solutions believe that modern slavery is a crime and a human rights violation we undoubtedly support the aims of the Act. Our employees are single biggest reason for our success, we are committed to operate free from forced labour, slavery, and human trafficking. We do not tolerate forced labour, slavery, or human trafficking in any form, in any part of our business or supply chain.

We make clear that “we will not tolerate human trafficking or forced labour in any part of our business activities or anywhere within our supply chain.”

We reinforce our stance and commitment through our internal policies and procedures to ensure that our employees and supply chain partners are conducting business in an ethical and transparent manner. These policies and procedures include:

+ Recruitment. We operate detailed recruitment policies and procedures, including conducting eligibility to work in the UK checks for all employed staff. Our head office team processes via a Right to Work application to conduct compliant Right to Work checks which is automatically updated to reflect home Office legislation.

The Right to Work application completes facial recognition and biometric reading to ensure that the document provided is authentic and meets the legal current requirements.

+ Equal Opportunities. Our policies and controls protect staff from poor treatment and/or exploitation, we comply with all UK laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.

+ Supply Chain. Our service partners (suppliers) are contractually obliged to ensure compliance with anti-slavery legal obligations and to allow KES to audit their compliance as further detailed below.

+ Whistleblowing Policy. Our whistleblowing policy that lets all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.

Risk Assessments and Due-diligence business partners

The Key Enviro Solutions Limited carry out varying levels of due diligence on our business partners depending on our assessment of the potential risk presented by that relationship.

Our suppliers are required to complete a Key Enviro Solutions Limited Supplier Request Form, which includes questions regarding modern day slavery, and we include robust provisions in our standard subcontracting agreements to require our subcontractors and agencies to comply with applicable anti-slavery laws and to be transparent with their actions in this regard to allow Key Enviro Solutions Limited to monitor performance. We ensure that all our service delivery partners confirm to us that:

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



Training on slavery and human trafficking

We regularly conduct training for all staff and management on the requirements of the Act,

- how to spot risks of modern slavery and human trafficking
- how to report concerns. In 2022,

Key Enviro Solutions continued to evolve our approach to raising awareness of modern slavery by expanding on the e-Learning modules we had created in 2020 for all staff and management.

The aim of these trainings is to continue to raise awareness and help employees to identify signs of slavery in the business and supply chain, to review the legal implications under the Modern Slavery Act and give real-life scenarios and practical steps to identify and act on modern slavery abuses across all parts of the supply chain.

Key Enviro Solutions Code of Conduct policies, including:

- Anti-Bribery
- Casual Workers
- Equal Opportunities
- Ethical Trading
- Eligibility to Work
- Procurement
- Recruitment and Vetting
- Whistleblowing
- Working Time Regulations



We understand that compliance with the Act requires continuous diligence, and we regularly collaborate with our customers and business partners to stay abreast of successful training methods being employed across the UK and participate in industry working groups focused on sharing best practices.

Performance indicators and reporting a concern

The steps that we are taking to ensure that slavery and human trafficking are not taking place within our business or supply chain will be effective if:

+ No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified; and

+ We maintain good levels of communication and personal contact with our supply chain partners and confirm their understanding and compliance with our expectations.

2022, Key Enviro Solutions Limited did not receive any reports to indicate that modern slavery practices were occurring in either our own workforce or our supply chain.

The signs aren't always clear

Key Enviro Solutions Limited encourages use of our Hotline and other reporting processes as part of our many enterprise-wide compliance trainings and strictly enforce our anti-retaliation policies.

Key Enviro Solutions encourage employees and service partners to raise ethical or legal concerns regarding Key Enviro Solutions or our service partners through the following channels:

- Key Enviro Solutions Limited Compliance Hotline (at 0800-069-8801 UK) to report possible violations of law, Key Enviro Solutions Code of Business Conduct, or other Key Enviro Solutions policies, the Hotline is available 24/7;