

# **Corporate Social Responsibility (CSR) Policy**

(Revised: September 2024 v7.0)

This policy applies to all of the operations of The Clean Space and sets out the minimum standards which the board expects from staff in their internal and external dealings with colleagues, clients and third parties.

#### 1. OUR CORE PURPOSE

The core purpose of the Clean Space is to be different from other cleaning companies by:

- Treating all of our employees with the respect they deserve;
- Fully support our employees to allow them to do their jobs;
- Paying our employees fairly for the work that they do; and
- Being innovative and technology driven.

We believe that by fostering a culture of empowerment, openness and teamwork, within a fun and supportive environment, allows us to better engage and motivate our staff. In return our staff will provide excellent customer service and high quality cleaning for our clients.

## So in practice:

- We make our cleaners happy, safe and secure;
- We regularly surprise our clients with the quality of our cleaning service;
- We deliver profits by selling as much as we can, maximising price, running contracts efficiently, upselling our other products and services and minimising costs;
- We innovate and develop the business and ourselves to continually improve; and
- We get the job done well!

#### **Our Core Values**

The Clean Space has five core values (T-E-M-P-O). Values are there to help guide choices, decisions and behaviours at work. We want everyone to live and breathe The Clean Space values and contribute to our strong company culture. Staying focussed on these values allows us to meet our customer's needs, be a good colleague and perform our jobs effectively.

Work **Together** to achieve our mission Focus on **Efficiency** Make a **Measurable** difference Care about **People** & the environment Take **Ownership** 

#### 2. CLIENTS

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The Clean Space is committed to providing a safe, value for money, high quality and consistent, accessible and reliable service to all of its clients.

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We strive to change the way in which people perceive cleaning and the way they feel about the industry. We strive for maximum success in everything we do in order to achieve client and employee satisfaction.

#### We will:

- Act in accordance with fair business, marketing and advertising practices, taking all reasonable steps to ensure the safety of our services;
- Respect the human rights of our clients our security and revenue protection arrangements are consistent with standards for law enforcement with the UK;
- Provide transparent and effective procedures that address client complaints and contribute to fair and timely resolution of disputes without undue cost or burden;
- Not make representations or omissions, not engage in any other practices that are deceptive, misleading, fraudulent or unfair;
- Respect client privacy and provide protection for personal data in accordance with the relevant legislation.

### 3. BUSINESS PARTNERS

We aim to develop strong relationships with our suppliers and others with whom we have dealings, based on mutual trust, understanding and respect. In those dealings, we expect our partners to adhere to business principles consistent with our own.

The Clean Space will conduct their operations in accordance with the principles of fair competition and applicable regulations.

### 4. COMPLIANCE WITH LAW

All members of the Company will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

# 5. BUSINESS INTEGRITY/ ANTI-BRIBERY

The Company is committed to applying the highest standards of ethical conduct and integrity to its activities. When acting on behalf of the Company our employees are responsible for maintaining the Company's reputation and for conducting business honestly and professionally.

Therefore our employees agree that they will not offer, promise, give, request, agree to receive, or accept any bribes whether in the course of their employment, when conducting Company business or when representing the Company. A bribe means a financial payment or other form of reward or advantage, whether direct or indirect, that is intended to induce or influence an individual, company or public body to do business improperly, by not acting in good faith, not acting impartially, or not acting with a position of trust. The Company is entitled to summarily dismiss employees who are found to be in breach of the Company's bribery policy.

# 6. THE ENVIRONMENT

The Clean Space is committed to making continuous improvements in the management of its environmental impact and sustainability.

The Company takes a holistic view to environmental sustainability and will use our human and natural resources in an efficient and sustainable way. The goal is to provide a service which minimises the use of water and using sustainable and recycled products and materials within a friendly work environment.

The Company has been awarded ISO 14001 Environmental accreditation for its efforts to reduce Carbon emissions.

We take a flexible and intelligent approach to reducing our carbon footprint shows that we have taken practical actions we have taken to actively reduce our environmental impact, demonstrating our commitment to clients, employees and suppliers.

Within our own offices we recycle, we turn off the lights and equipment when we are not using them. We use public transport, have a bike to work scheme, and where possible and appropriate, we work from home.

All employees are encouraged to reduce waste, thinking before printing, going for packed lunches over ready meals, refusing a plastic bag when shopping and reusing paper, packaging etc.

We actively recycle and have bins throughout our offices and wherever possible we purchase recycled pens, paper, calculators etc.

Within our external operations on client premises we follow our client's Carbon emission policies and we endeavour wherever possible to carry out our activities when there are client staff on site, minimising the need for additional lighting. All operational staff are instructed to ensure that no unnecessary lights are switched on and that all lights are switched off after cleaning has taken place.

### 7. ENVIRONMENTAL POLICY

Through our core business activities, we are committed to providing good quality, reliable and cost effective cleaning services to all our clients. Our core business strategy is to increase client confidence and encourage a greater move towards the use of our services. This will, in turn, support the needs of society to achieve more sustainable business. At the same time we recognise the environmental impacts arising from our business activities and are committed to reducing these through effective environmental management.

Our policy is to strive to achieve continual improvement in environmental performance and sustainability.

We are committed to: -

- Preventing pollution and reducing the overall impact of our operations on the environment;
- Maintaining an internal management structure for the management of environmental issues, which includes clearly defined responsibilities for environmental management capable of delivering this policy commitment;
- Monitoring our environmental performance and setting objectives and targets for improvement providing appropriate training and awareness programmes for our employees;

- To endeavour to use and actively promote the use of environmentally friendly products within our operations and for our clients;
- We recognise the key role we have to play in both reducing and contributing to greenhouse gas emissions from within our operations.

Methods for meeting the objectives within our Environmental Management Programme include:

- Maximising the reuse, recycling and sustainable disposal of waste.
- Minimising unnecessary energy usage and waste.
- Minimising the impact of company car usage.
- Purchasing consumables in an environmentally sustainable and fair manner.
- Minimising unnecessary water usage and waste.
- Ensuring that buildings are maintained in a manner that minimises environmental impact. We have in place a full environmental policy which details how these impacts will be monitored, managed and wherever possible, reduced.

#### 8. COMMUNITY INVOLVEMENT

The Clean Space Partnership strives to be a good corporate citizen and to fulfil our responsibilities to the communities in which we operate.

### 9. CONFLICTS OF INTEREST AND CONFIDENTIALITY

Information received by any employee in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given. Where information is private, confidentiality must be respected.

# 10. HEALTH AND SAFETY

The health and safety of our employees and clients is our top concern. Safety underpins all our operations.

It is the Company's duty to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees. This requires that regard is paid in particular to:

- Maintaining healthy and safe premises, as well as a healthy and safe working environment.
- Providing and maintaining safe systems at work.
- Providing health and safety information and training.
- Publishing and regularly updating a Company Safety Policy.
- Ensuring safety in the use of articles and substances.
- Conducting special risk assessment for expectant, new mothers and young persons.
- Providing such information, training, instruction and supervision as is necessary to ensure the health and safety at work of all employees.

We have a Health and Safety Contract Site Pack that is available at every client site and which details information relevant to the health and safety of our employees undertaking the work. The purpose of this is to ensure the site is a safer environment and is to be used as a point of reference for anyone on the premises.

All of our employees have complete training on Health and Safety and we ensure they understand any Health and Safety risks that could arise from our work activities, emergency procedures, safe handling and use of substances (COSHH), what happens if an accident occurs, lone working policy and procedure, violence at work, etc. All employees are fully briefed on fire precautions and evacuation procedures in the event of fire.

In addition they will be briefed on other site specific rules and security issues and will always wear their uniform and ID badge whilst at the client site. We are a firm believer that if employees are not well trained they will not deliver a consistently high standard. Our managers and supervisors are trained to manage and motivate their teams. All the cleaning operatives are trained on cleaning methodology, product use and equipment use for the best results.

We are a member of the British Institute of Cleaning Science (BICSc) and Safe Contractor.

The Board of Directors and senior management of The Clean Space are committed to ensuring, as far as possible, the health, safety and welfare of all of its employees at work and also the safety of clients and others.

This policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property and the environment. It is based on the principles that:

- All injuries can be prevented;
- The goal is zero injuries;
- Safety is the responsibility of all employees;
- Working safely is a condition of employment;
- The Managing Director and nominated directors are tasked to ensure that as far as possible, there are adequate arrangements and organisation for health and safety in place within their area of responsibility;
- Responsibilities for carrying out these arrangements are clearly allocated;
- All employees are given appropriate information, instructions and training;
- Adequate supervision is provided to ensure compliance with policies and safe systems of work.

### 11. SECURITY

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The kind of work we do brings with it the need for the tightest possible security. We have a complete document outlining the security procedures that we use, however the list is not exhaustive and it is for each employee to ensure their own personal security and that of others and to follow any local security procedures that may be in place.

# 12. EQUAL OPPORTUNITIES POLICY

The Clean Space recognises and values the diversity of its staff and is committed to developing working practices which will allow every member of staff to contribute his or her best, regardless of race, sex, marital status, religion or belief, age, disability, sexual orientation, gender reassignment or any other irrelevant factor.

The Company is committed to ensuring equal opportunities and fair treatment in the workplace for all our employees. One of the key aims of the policy is to enable the Company to provide a working environment in which all employees feel comfortable and in which everyone is treated with respect and dignity.

We seek to promote diversity and to respond to the needs of all individuals in a fair and equitable manner, whilst observing our commitment and responsibility to current legislation. To achieve this, the Company will:

- Fulfil its social responsibility towards its employees and the communities in which it operates.
- Recognise all of its legal obligations.
- Recruit, train and promote the best person for the job, to make full use of the talents and resources of all its employees and to create a working environment free from unlawful discrimination, victimisation and harassment in which all employees are treated with dignity and respect.
- Periodically review its selection criteria and procedures and maintain a system where individuals are selected, promoted and treated solely on the basis of their merit and ability specific to the job role.
- Distribute and continuously publicise its equal opportunities & diversity policy throughout the company, in advertising, and elsewhere as appropriate.
- Provide the facilities and opportunity for any employee who believes that they have been treated inequitably within the scope of the equal opportunities & diversity policy to raise the matter through the appropriate grievance procedure.

#### 13. HUMAN TRAFFICKING AND ANTI- SLAVERY

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager OR a Company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager or a Company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

### **COMMUNICATION AND AWARENESS OF POLICY**

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **BREACHES OF THIS POLICY**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 14. LEGISLATION AND CODES OF PRACTICE

We will comply with and exceed where possible, current national legislation and relevant codes of practice where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

## 15. ACCESS TO INFORMATION

We will seek to ensure that information is made available to our clients and employees in alternative formats as required.

# 16. RECRUITMENT

All recruitment will be carried out with regard to fairness, equality and consistently for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

#### 17. STAFF TRAINING

We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

### 18. HUMAN RIGHTS POLICY

The Clean Space supports the principles of the United National Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect to our employees: -

- We will treat all employees fairly and honestly, regardless of where they work. All staff will
  have agreed terms and conditions in accordance with local law or practice and will be given
  appropriate job skills training;
- We will pay a fair wage reflecting local markets and conditions. We will always meet National Minimum Wage;
- Working hours shall not be excessive. They shall comply with industry guidelines and in accordance with the Working Time Regulations 1998;
- We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child behaviour;
- The Company has established a zero-tolerance on any violations of anti-human trafficking and anti-modern slavery laws.
- Employees have the right of freedom of association and collective bargaining. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management;
- We will negotiate in good faith with the properly elected representatives of our employees;
- We will abide by the non-discrimination laws;
- We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard
- We have formal grievance procedures through which staff can raise personal and work-related issues.

#### 19. DATA PROTECTION

We will comply with the relevant principles governing data protection in accordance with General Data Protection Regulation (GDPR).

# 20. SUPPLIERS: ETHICAL PURCHASING AND PROCUREMENT POLICY

The Clean Space is committed to procuring its works, goods and services in an ethically and environmentally sensitive way, yet with proper regard to its commercial obligations, ensuring that suppliers deliver to agreed timescales, quality and cost.

Purchasing is undertaken in a manner that encourages competition, and offers fair and objective evaluation of offers from all potential suppliers

- We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core supplies and services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing policy as part of ensuring that our business standards are integrated throughout the supply chain;
- We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment;

• We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.

More specifically we expect our suppliers to:

- Adhere to business principles consistent with our own;
- Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business;
- Seek to maintain continuous improvement in their supply chain relationship with us;
- Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

# We will seek to work with our key suppliers to:

- Develop long-term meaningful relations to the benefit of both parties;
- Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

#### 21. REVIEW:

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.