

MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

Wase Support Services Ltd

Company number: SC826595

Applicable to employees, workers, agency personnel, subcontractors and suppliers

Our commitment

Wase Support Services Ltd has zero tolerance for modern slavery, forced labour, servitude and human trafficking. This policy is adopted as part of our ethical employment, procurement and supplier-management framework and is informed by the Modern Slavery Act 2015.

Document owner	Director
Effective date	3 October 2026
Review date	October 2027
Status	Approved

1. Introduction and scope

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking. Wase Support Services Ltd is committed to acting ethically, transparently and with integrity in its own operations and in relationships with suppliers, subcontractors and other external providers.

This policy explains the controls we expect to use to identify, prevent, report and respond to modern slavery risks. It applies to people working for or on behalf of Wase and sets the standards we expect from organisations in our supply chain.

2. Our business

Wase Support Services Ltd is a Glasgow-based property support and soft facilities management business. Our activities include security services, cleaning, grounds and garden maintenance, painting and decorating, window cleaning, roof and gutter cleaning, and related property-support services for residential and commercial clients.

Because many of these services are labour-intensive, effective recruitment, clear employment terms, lawful pay and proportionate oversight of subcontracted labour are important parts of our control framework.

3. Areas of modern slavery risk

Potential exposure is greatest where labour or goods pass through several layers and the employment relationship becomes less visible. We therefore pay particular attention to:

- labour-intensive cleaning, security, grounds and property-support assignments;
- temporary, agency or subcontracted labour where responsibility for recruitment may sit outside Wase;
- informal recruitment, worker-paid recruitment fees, debt, coercion or retention of identity documents;
- suppliers or subcontractors operating in labour markets with increased exploitation risk; and
- complex supply chains for uniforms, equipment, consumables and cleaning products.

4. Policies and controls

CONTROL	PURPOSE
Modern Slavery Policy	Zero-tolerance position, responsibilities, reporting and response.
Recruitment & Right to Work	Appropriate checks before employment, clear terms and lawful recruitment.
Whistleblowing	A route for raising concerns in good faith without retaliation.
Code of Conduct	Expected ethical and professional behaviour by workers and providers.
Supplier Due Diligence	Proportionate checks before engagement and enhanced review where risk is higher.

5. Recruitment and worker protection

- **Right to work:** appropriate identity and right-to-work checks are completed before employment.
- **Clear employment terms:** workers should understand who employs them, the work expected, pay arrangements and the main terms of the role.
- **No worker-paid recruitment fees:** Wase does not support charging workers recruitment fees as a condition of obtaining work.
- **No retention of identity documents:** passports or identity documents must not be withheld as a means of control.
- **No coercion:** threats, debt bondage, forced overtime, intimidation and restrictions on a worker's freedom are unacceptable.
- **Lawful pay:** workers must receive at least the applicable statutory minimum and be paid in accordance with agreed terms.

6. Suppliers, subcontractors and external providers

Wase expects external providers to share our zero-tolerance approach. Due diligence is proportionate to the labour model, the service being provided, the country of operation and any identified risk indicators. Where appropriate, we may request information about recruitment, employment practices, subcontracting arrangements and modern slavery controls.

- take reasonable steps to prevent modern slavery in their operations and supply chains;
- use lawful recruitment and employment practices and comply with applicable wage requirements;
- avoid worker-paid recruitment fees and the retention of identity documents;
- cooperate with reasonable enquiries, corrective-action requests or audits where risk has been identified; and
- understand that serious or unresolved breaches may result in suspension or termination of the commercial relationship.

7. Reporting concerns and responding

Employees, workers, subcontractors and suppliers should raise concerns promptly if they suspect exploitation, trafficking, forced labour or coercive working practices. Concerns may be raised with a supervisor or directly with the Director. Reports made in good faith should be treated seriously and without retaliation.

Immediate danger: call 999.

Non-emergency police matter: use the appropriate police reporting route.

Internal concern: info@wasesupportservices.co.uk | 0141 291 5175

8. Training and awareness

Modern slavery awareness will be incorporated proportionately into training and briefings for managers, supervisors and staff whose roles include recruitment, procurement, subcontractor management or site supervision.

- recognising common indicators of forced labour, trafficking and coercive recruitment;
- knowing how to record and escalate concerns without unnecessary confrontation;
- understanding supplier and subcontractor due-diligence expectations; and
- refreshing awareness when new sectors, labour arrangements or supply-chain risks are introduced.

9. Monitoring and performance indicators

The absence of reported cases does not, by itself, prove that no risk exists. We therefore monitor whether our controls are being applied and whether concerns are handled appropriately.

- completion of required right-to-work and recruitment records;
- completion of proportionate supplier or subcontractor checks for higher-risk engagements;
- completion of relevant awareness training or briefings;
- the number and nature of concerns raised and whether they were assessed promptly;
- supplier corrective actions, suspensions or terminations arising from serious labour concerns; and
- annual review of this policy following business growth, new sectors or changes to labour arrangements.

10. Responsibilities

ROLE	RESPONSIBILITY
Director	Overall accountability, policy approval, review, serious escalations and supplier decisions.
Managers / Supervisors	Apply recruitment, site and reporting controls; escalate concerns and support staff awareness.
Employees / Workers	Follow this policy, report concerns in good faith and avoid conduct that contributes to exploitation.
Suppliers / Subcontractors	Meet Wase's ethical labour expectations and cooperate with proportionate due diligence.

11. Approval and review

This policy has been approved by the Director of Wase Support Services Ltd. It will be reviewed at least annually, or sooner where there is a material change to the business, workforce model, supply chain or relevant legal guidance.

Eseosa A. Akpojumor

Electronic signature

Eseosa Andy Akpojumor

Director

Wase Support Services Ltd

Approved: 3 October 2026

Legal framework note

Section 54 of the Modern Slavery Act 2015 requires certain commercial organisations with annual turnover of £36 million or more to publish an annual modern slavery statement. Wase adopts this policy as part of its ethical governance framework and will keep its legal reporting obligations under review as the business develops.