

# Modern Slavery Policy

# 2024

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## About the Modern Slavery Act

The Modern Slavery Act came into force in the UK on July 1, 2015, and was created to tackle the serious and brutal crime of slavery, in all its forms.

Modern Slavery is a form of organised crime in which victims are treated as commodities and exploited for sex or criminal gain, domestic servitude, and forced or compulsory labour. The victims come from all walks of life and can be found all over the globe. They are often unwilling to come forward to law enforcement or public protection agencies, which means it has become increasingly important for commercial organisations to take a proactive role to ensure that slavery and human trafficking is not taking place within their businesses or any related supply chains.

In the UK Modern Slavery act 2015, the government solidified this need by introducing an important new provision focused on transparency. The provision requires organisations of a certain size to publish an annual slavery and human trafficking statement. This policy aims to satisfy that requirement by providing interested parties with appropriate information about our attitude and approach towards modern slavery.

## Introduction

Originally founded in 1989, Direct Valeting Ltd set out to become the premium provider of contract vehicle cleaning and valeting services to the main motor dealerships in the UK. This was to be achieved by embedding the right values from the start, and delivering the highest quality at all levels. Today, we service over 500 customers throughout England and Wales, and as we continue to grow, our focus remains on quality and those core values, which means that the safety and welfare of everyone working for us or on our behalf in any capacity, (including employees at all levels, directors, officers, agency workers, agents, contractors, subcontractors, and suppliers) is at the heart of everything we do.

## Policy Statement

Direct Valeting has a zero-tolerance approach to modern slavery, in all its forms, and is committed to conducting its business in such a manner to prevent and tackle modern slavery in our organisation and supply chain, as well as promoting the safety and welfare of our staff, subcontractors, suppliers, and customers.

We believe it is very important that everyone who interacts with our business and supply chain should share and practise our own values and have appropriate policies and practices in place to help achieve this.

## Our Supply Chain

In preparing the Statement, we have assessed the risk of modern slavery across our business and supply chain including through the various partnerships and practices in place, to ensure that we can identify, react to and address any issues.

### Service providers:

Direct Valeting has a long-standing relationship with the small number of reputable external companies it engages to provide the range of key services, including IT, suppliers of chemicals, materials, work wear, and equipment (including maintenance).

### Subcontractors

Most of our valeting workforce is made up of Subcontractors.

Our processes for the recruitment of Subcontractors are transparent, with appointments approved by Directors. There are robust procedures in place for the vetting of new subcontractors that enables us to confirm their identities, and ensure they are paid directly and correctly.

### **Risk of Modern Slavery in our Business and Supply Chain**

Direct Valeting is committed to building a comprehensive understanding of the key risks across our business and supply chain. We have partnered with clients, law enforcement, and Unseen UK to help inform our understanding of modern slavery risks. We have assessed our key service providers, and while we deem these to be low risk, we continue to perform due diligence when engaging with third parties, including through review of the third parties' own Modern Slavery Policies where applicable. We also continue to seek contractual protections where appropriate and have measures in place to check that our key suppliers are compliant with their obligations and promptly reporting any serious concerns regarding modern slavery.

Due diligence when engaging Subcontractors includes seeing evidence of their identity and right to work in the UK before they can carry out any work for us.

In 2024, we continue to closely review our policies and procedures and examine where potential modern slavery risks could arise in our business. In practice, this could manifest itself in individuals having restricted freedom of movement or decision making, provision of shared accommodations and central payment for services to a single person, (for paying individuals later). Account sharing syndicates and other indicators that might suggest Subcontractors are being exploited are risks we are more alert to, including where in the country these risks are higher. We continue to develop more robust measures to prevent this happening and reduce our risk exposure and educate our employees about the signs to look out for and what action to take should they have any suspicions.

### **Compliance / Implementation**

Direct Valeting has implemented several policies, practices and procedures in order to comply with the policy, including:

1. Communicating with and training staff and encouraging them to report concerns.
2. Providing a Protected Disclosure (or "Whistleblowing") Policy, and trained personnel who can deal with any concerns, including modern slavery issues.
3. Investigating thoroughly any issues/concerns detected and reporting legitimate concerns to the appropriate authorities.
4. Tracking, monitoring and preventing the risk of occurrence through vigilant and diligent management.
5. Maintaining and updating HR policies in line with legislation and best practice.
6. Recruiting procedures that ensure appropriate due diligence.
7. Recruiting as a minimum to the National Minimum Wage level and employees achieving the National Living Wage within 12 months of joining the company.
8. Applying sanctions against those suppliers who do not conform to legal requirements.
9. Periodic auditing/review of related procedures and control systems to ensure they are effective in preventing modern slavery, always with the aim of developing and improving them further.

We continue to work closely with Law Enforcement to ensure that our approach is aligned to best practice and monitor and update our approach to modern slavery on an ongoing basis, considering what further measures might help us to achieve our objective of prevention and reporting of modern slavery concerns.

### **Responsibilities**

The board of directors has overall responsibility for implementing this policy and ensuring the Company, and all those working for and on behalf of it, complies with the legal and ethical obligations, and for ensuring its processes are effective in preventing, detecting, and reporting on modern slavery.

Senior Managers are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training.

It is the responsibility of everyone working for the Company or under the Company's control to avoid and report on any activity that might lead to a breach of this policy.

### **Reporting of Breaches**

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or, the HR Manager or a Director. These breaches (suspected or actual) are to

be passed to our HR Manager so that they can be reported to the national authorities (as required by the National Referral Mechanism (NRM)).

As an employee, you are encouraged to raise concerns about any issue or suspicion of modern-day slavery in any part of the Company's business as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with a director or the HR Manager in accordance with the Protected Disclosure ("Whistleblowing") Policy, as defined in your Employee Handbook.

Direct Valeting will support anyone who raises a genuine concern in good faith under this policy. The company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of the business or in any of its supply chain.

#### **Breaches of the Policy**

Any breach of our Modern Slavery Policy by any employee will result in disciplinary action which could result in dismissal for gross misconduct.

The company will terminate any commercial relationships with suppliers if they are in breach of our policy and/or are found to have been involved in modern slavery.

#### **Declaration**

This statement has been approved by the Board of Direct Valeting Ltd and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2024.

Signed:

Name: Jason Carpenter

Managing Director