

# PrimePath Modern Slavery Policy

Last updated: 11 February 2025

## 1. Our Commitment

PrimePath Services Limited is fully committed to preventing modern slavery and human trafficking in all its operations and supply chains, in compliance with *Section 54 of the Modern Slavery Act 2015*.

As a Weston-super-Mare-based commercial cleaning company, we:

- Conduct annual risk assessments based on Home Office guidance.
- Require ethical labor practices from all suppliers and subcontractors.
- Maintain 24/7 reporting channels for concerns related to modern slavery.

Signed:

**David Vega**

Director, PrimePath Services Limited

## 2. Definitions

Modern slavery encompasses the following:

- **Forced Labour:** Work extracted under threat or coercion.
- **Human Trafficking:** The recruitment, transport, or harboring of individuals for exploitation.
- **Child Labour:** Employment of under-18s in hazardous roles beyond legally permitted light work.
- **Debt Bondage:** Work demanded as a means of debt repayment under unfair conditions.

Full definitions are aligned with International Labour Organization (ILO) Conventions 29 & 182.

## 3. Risk Areas & Controls

Our Operations

<b>Risk</b>	<b>2025 Control Measures</b>
<b>Temporary staff</b>	Right-to-work verification + DBS checks where required.
<b>EU equipment suppliers</b>	Transitioning to UK-based manufacturers/suppliers
<b>Waste subcontractors</b>	Monthly site inspections and compliance audits

#### Supplier Requirements

- Prohibit recruitment fees charged to workers.
- Ensure unrestricted movement of employees during shifts.
- Provide Personal Protective Equipment (PPE) at no cost to workers.

## 4. Due Diligence Process

#### *For New Partners*

- Mandatory ethics declaration signing.
- Onsite audits for contracts exceeding £10,000.
- Reference checks with local businesses.

#### *For Existing Partners*

- Quarterly reviews of wage records and working conditions.
- Annual sustainability and compliance questionnaire.

## 5. Reporting & Support

#### 24/7 Reporting Channels

-  Hotline: 0800 061 4500 (Modern Slavery Helpline)
-  Email: [info@theprimepath.co.uk](mailto:info@theprimepath.co.uk) (Anonymous reporting available)

#### Our Commitments

- No retaliation against whistleblowers.
- Immediate liaison with police for urgent cases.
- Support referrals through the National Referral Mechanism (NRM).

## 6. Training Program

### 2025 Focus

Group	Training Format	Frequency
Staff	Home Office e-learning + scenario workshops	Annual
Managers	Spotting exploitation signs	Quarterly
Suppliers	Compliance webinars	Onboarding

## 7. Governance & Performance Tracking

### Oversight

- Quarterly reviews led by senior leadership.
- External audits conducted by compliance advisors.
- Public annual updates on modern slavery efforts.

### Performance Tracking

KPI	Target
Supplier compliance rate	100% declarations
Staff training completion	100% by Q2 2025
High-risk audits	15 spot-checks/year

## 8. Incident Response & Escalation

### UK Protocol

- **Immediate reporting to police** (101 for non-urgent, 999 for emergencies).
- **Victim support referrals** via Unseen UK charity.
- **Internal investigation within 72 hours** of a reported incident.

This statement has been prepared in accordance with Section 54 of the Modern Slavery Act 2015 and will be reviewed annually.

**For further inquiries, contact:** [info@theprimepath.co.uk](mailto:info@theprimepath.co.uk)