



MODERN SLAVERY ACT 2015 POLICY

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Cluster Greens Limited

Document Owner: Director, Cluster Greens Limited	Version: 1.3
Effective Date: 28 March 2026	Review Date: 28 March 2027

1. Introduction and Purpose

This Modern Slavery Act 2015 Policy ("this Policy") sets out Cluster Greens Limited's approach to identifying, preventing, and addressing modern slavery, human trafficking, forced labour, and any form of exploitation within our business operations and supply chain.

This Policy supports Cluster Greens Limited's obligations under the Modern Slavery Act 2015, and should be read alongside our annual Modern Slavery and Human Trafficking Statement, published in accordance with Section 54(1) of the Act.

Cluster Greens Limited is committed to operating responsibly, ethically, and transparently, and to ensuring that modern slavery has no place within our organisation or within the organisations with which we conduct business.

2. Scope

This Policy applies to all directors, employees, workers, contractors, consultants, and other personnel engaged by Cluster Greens Limited, regardless of seniority or location. It also extends to our expectations of suppliers, subcontractors, and other business partners engaged in our supply chain.

3. Definitions

For the purposes of this Policy, the following terms have the meanings set out below:

- Modern slavery: an umbrella term encompassing slavery, servitude, forced or compulsory labour, and human trafficking.
- Slavery and servitude: circumstances in which a person exercises powers of ownership or control over another, depriving them of their freedom.
- Forced or compulsory labour: work or service extracted from a person under the menace of any penalty, and for which the person has not offered themselves voluntarily.
- Human trafficking: arranging or facilitating the travel of another person with a view to that person being exploited.
- Exploitation: includes sexual exploitation, forced labour, slavery, servitude, and the removal of organs, as defined under the Modern Slavery Act 2015.

4. Policy Statement

Cluster Greens Limited has a zero-tolerance approach to modern slavery and human trafficking. We are committed to:

- respecting human rights across all business activities;
- ensuring that all individuals are treated fairly, with dignity and respect;
- preventing forced labour, servitude, exploitation, and human trafficking;
- complying with applicable UK employment, equality, and workplace legislation;

- working only with suppliers, contractors, and business partners who share our commitment to ethical business practices.

Cluster Greens Limited will not knowingly engage with any organisation involved in slavery, human trafficking, forced labour, or any form of exploitation.

5. Roles and Responsibilities

Responsibility for this Policy is shared across the organisation as follows:

- The Board of Directors has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that those who work for or on behalf of Cluster Greens Limited comply with it.
- The Director acting as Document Owner is responsible for the implementation of this Policy, for reviewing its effectiveness, and for monitoring its use.
- Line managers are responsible for ensuring those they manage understand and comply with this Policy, and for identifying and escalating any concerns.
- All employees, workers, and contractors are responsible for reading, understanding, and complying with this Policy, and for raising any concerns in accordance with Section 10 below.

6. Recruitment and Employment Practices

Cluster Greens Limited is committed to fair, transparent, and ethical recruitment and employment practices. Where employees, contractors, or associates are engaged, we ensure that:

- individuals have the legal right to work in the United Kingdom where applicable;
- recruitment processes are fair, transparent, and non-discriminatory;
- workers are engaged voluntarily and are not subject to coercion, deception, or exploitation;
- individuals are treated with respect and provided with appropriate working conditions;
- concerns can be raised without fear of retaliation or detriment.

7. Supply Chain Due Diligence

Cluster Greens Limited recognises that modern slavery risks can exist within supply chains. We take reasonable steps to minimise these risks by:

- engaging responsibly with suppliers and third parties;
- considering ethical practices when selecting suppliers and business partners;
- communicating our expectations regarding human rights and responsible business conduct;
- avoiding relationships with organisations known to participate in unethical labour practices;
- incorporating, where relevant, compliance with modern slavery legislation into supplier engagement and contractual arrangements.

8. Risk Assessment and Due Diligence

Due to the nature, size, and operating model of Cluster Greens Limited, we consider the risk of modern slavery within our direct operations to be low. However, we remain committed to continuous improvement by:

- monitoring potential risks within our business activities and supply chain;
- reviewing relevant policies and procedures on a regular basis;
- maintaining awareness of modern slavery legislation and UK Government guidance;

- ensuring ethical considerations are embedded within business decisions, including procurement and supplier selection.

9. Training and Awareness

Cluster Greens Limited promotes awareness of modern slavery risks and encourages employees, contractors, and relevant personnel to understand their responsibilities under this Policy. Where appropriate, awareness will include:

- understanding modern slavery risks relevant to our business and sector;
- recognising potential indicators of exploitation;
- knowing how to report concerns in accordance with Section 10 below;
- ensuring personnel involved in procurement activities are aware of, and follow, relevant modern slavery procurement guidance published by the UK Government on GOV.UK.

10. Reporting Concerns

Cluster Greens Limited encourages employees, contractors, suppliers, and other stakeholders to raise concerns relating to modern slavery, human trafficking, forced labour, or unethical employment practices, wherever they are identified.

All concerns will be treated seriously, investigated appropriately, and handled confidentially where possible. No individual raising a concern in good faith under this Policy will suffer any form of retaliation or detriment as a result.

11. Breaches of this Policy

Any employee, worker, or contractor found to be in breach of this Policy may be subject to disciplinary action, up to and including termination of employment or engagement. Where a supplier or business partner is found to be in breach of the standards set out in this Policy, Cluster Greens Limited will review and, where appropriate, terminate the relevant business relationship.

12. Monitoring and Review

Cluster Greens Limited will continue to review and improve its approach to preventing modern slavery. This Policy will be reviewed annually by the Board of Directors, or sooner where significant changes occur within the organisation, its operations, or its supply chain.

This Policy should be read alongside Cluster Greens Limited's annual Modern Slavery and Human Trafficking Statement, published in accordance with Section 54(1) of the Modern Slavery Act 2015.

Approval

This Modern Slavery Act 2015 Policy has been approved by:


Jazeena Jazeem

Chief Operating Officer

Cluster Greens Limited

Date: 28/03/2026