Modern Slavery Policy

POLICY STATEMENT ON MODERN AND CHILD SLAVERY

This policy has been produced in accordance with the Modern Slavery Act 2015 and sets out the actions that Spectrum Franchising Limited (t/a Rainbow Restoration UK) will take to understand potential modern slavery & trafficking risks related to its business activities and supply chains.

This policy relates to actions and activities during the current financial year.

The following definitions are encompassed within the term 'modern slavery' for the purposes of the Modern Slavery Act 2015, these are:

- 'Slavery' is where ownership is exercised over a person.
- 'Servitude' involves the obligation to provide services imposed by coercion.
- 'Forced or Compulsory Labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily
- 'Human Trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.
- Child Slavery is the enforced exploitation of a child for someone else's gain, meaning the child will have no way to leave the situation or person exploiting them.

Spectrum Franchising Limited (t/a Rainbow Restoration UK) is committed to preventing modern slavery & trafficking in its business activities and its supply chains. Spectrum Franchising Limited (t/a Rainbow Restoration UK) recognises that a focus on tackling modern slavery not only protects vulnerable workers and helps prevent and remedy severe human rights violations, but it can also bring several business benefits too. These include:

- Protecting and enhancing an organisation's reputation and brand.
- Protecting and growing the organisation's customer base as more consumers seek out businesses with higher ethical standards.
- Improved investor confidence.
- Greater staff retention and loyalty based on values and respect.
- Developing more responsive, stable and innovative supply chains.

The attached Modern Slavery Procedure details the actions that have been implemented, and will continue to be, with the aim of fulfilling this commitment.

This policy will be subject to review following any significant change event (e.g. change in workforce, employment conditions, supply chain), knowledge transfer, lessons learnt, and identification of non-compliance and as a minimum annually.

As the individual ultimately responsible for company compliance I endorse this policy.

Signed on behalf of Spectrum Franchising Limited (t/a Rainbow Restoration):



Name: Ron Rookledge

Job Title: Interim Managing Director

Date: 07/10/2026

PROCEDURE

ORGANISATION, STRUCTURE AND SUPPLY CHAINS

Spectrum Franchising Limited (t/a Rainbow Restoration UK) is a leading provider of Disaster Recovery and Specialist Cleaning Services across the UK, offering solutions to both commercial and domestic clients. With a strong reputation built on technical expertise and a commitment to personal service, we ensure successful project outcomes while maintaining a focus on health, safety and environmental performance. We are an established business with a long-standing record of quality workmanship and service delivery.

We primarily source materials domestically but recognise the potential risks associated with extended supply chains, particularly with respect to modern slavery and human trafficking. Whether working on domestic, commercial or larger MCL projects, we engage with a variety of suppliers, including:

- **Skilled Labour**: Directly employed workers and subcontracted skilled labour (including self-employed CIS contractors or individual limited companies), many of which are micro or small businesses.
- **Building Material Suppliers:** Predominantly large national companies providing essential materials for our projects.
- **Equipment Hire:** Ad-hoc hire of machinery and equipment, primarily for larger MCL projects but occasionally for specific domestic projects requiring specialised equipment.
- **Workwear and Personal Protective Equipment (PPE) Suppliers.**
- **Business Support Services.**

We remain vigilant in monitoring compliance across our entire supply chain, regardless of the scale of the project, and actively work to identify and mitigate any potential risks associated with modern slavery as outlined under the Modern Slavery Act 2015.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Whilst Spectrum Franchising Limited (t/a Rainbow Restoration UK) is not classified as a large company and is therefore not subject to the specific reporting requirements of the Modern Slavery Act 2015, it plays a crucial role as a key contractor for larger organisations. As such, Spectrum Franchising Limited (t/a Rainbow Restoration UK) forms an integral part of their due diligence and compliance programs.

Spectrum Franchising Limited (t/a Rainbow Restoration UK) commitment to addressing modern slavery is reinforced by several associated policies and procedures, including:

- The Corporate Responsibility, Ethics and Sustainability Policy;
- The Work Safe Policy;
- The Whistleblowing Policy.

We regularly review these policies to ensure they remain relevant and aligned with the requirements of the Modern Slavery Act 2015.

RESPONSIBILITIES FOR MODERN SLAVERY

To ensure compliance with the Modern Slavery Act 2015 and to actively mitigate risks of modern slavery, the following roles and responsibilities have been defined:

ROLE	RESPONSIBILITIES
Managing Director	Accountable for overall compliance, including monitoring salaries, working conditions, and supply chain performance. Leads investigations into non-compliance.
Head of Operations	Oversees operational activities, ensuring that suppliers and subcontractors comply with ethical standards.
Leadership Team (including Franchise Branches)	Supports business strategy and operations, ensuring that all departments align with modern slavery compliance. Monitors compliance in HR, finance, and health & safety.
Franchise Branch Owners	Business owners responsible for ensuring compliance within their branches. Oversee the recruitment, welfare, and employment practices of workers. Ensure franchisee employees meet legal and ethical standards. This is underpinned by the FLA and Franchise Network Operations Manual.
Health, Safety, Quality & Environmental (HSQE) Manager	Ensures safe and compliant working conditions, conducts inspections, trains staff to identify risks, and supports investigations into reported incidents.
External Health & Safety Advisor	Provides expertise and support to the Health, Safety, Quality & Environmental (HSQE) Manager to ensure the business complies with relevant regulations and safety standards.
Head of Finance	Works with the external payroll provider to ensure timely payments, employment contracts, and verifies workers' right to work in the UK. Ensures financial compliance and oversight in relation to worker wages and contractual terms.
External Recruitment Agencies	Supports the business with the recruitment of workers, ensuring candidates meet legal and compliance requirements.
External HR Provider	Provides additional support on human resources matters, including ensuring employment practices are aligned with modern slavery regulations.
Managers and Supervisors (Site and Office-Based)	Responsible for monitoring and ensuring ethical working practices, including compliance with modern slavery laws. This includes overseeing both office and field-based staff, ensuring their safety and well-being. Works with HR and Health, Safety, Quality & Environmental (HSQE) Manager to enforce standards and report concerns.
All Employees (Site and Office-Based)	Ensure compliance with modern slavery laws in their roles, report concerns related to modern slavery in line with the Whistleblowing Policy and follow company procedures for ethical working practices. This includes monitoring working conditions and supply chains, as well as adhering to health and safety protocols.

DUE DILIGENCE PROCESS

Spectrum Franchising Limited (t/a Rainbow Restoration) has implemented a structured due diligence framework to minimise the risks of modern slavery. This framework involves a proactive approach to identifying, assessing, and managing potential risks, ensuring compliance with relevant laws and ethical standards.

Through this process, we assess the practices of our suppliers, contractors, and business partners, and continuously review internal policies to uphold labour rights and fair treatment for all workers.

The following tables outline the key direct internal risks associated with modern slavery, along with the control measures that have been implemented to address these risks.

MODERN SLAVERY DIRECT INTERNAL RISKS & CONTROL MEASURES

The key direct internal risks related to Modern Slavery within Spectrum Franchising Limited (t/a Rainbow Restoration UK), along with the corresponding control measures, are outlined in the table below:

ISSUE	RISK	RISK CONTROL MEASURES
No Contracts of Employment	No contract of employment means that the rights of the worker are undefined or unclear.	All employees are provided with contracts of employment to define their rights clearly.
Zero Hours Contracts	Zero hours contracts produce uncertainty about work availability and may include restrictive clauses.	The company does not use Zero Hours contracts, ensuring consistent work availability and job security.
Under Pay – Living Wage	Underpaying workers means they cannot meet their own expenditure and welfare needs.	All employees are paid the current living wage.
Under Pay - Market Rate	Underpaying workers below the sector's average market rate causes dissatisfaction and mental health impacts.	Workers are paid according to the agreed sector's average market rate, ensuring fair compensation for their work.
Late Payment of Invoices	Late payment can create cash flow problems for suppliers, impacting their ability to pay workers.	The Head of Finance ensures timely payment of supplier invoices to prevent cash flow issues that could impact workers.
Excessive working hours	Working excessive working hours, defined by the NHS as working greater than 56 hours per week, or not providing suitable rest periods – 20 minutes for every 6 hours worked, 11 hours between shifts, one day off per week, and adequate changes between day and night shifts, can lead to tiredness and fatigue with links to impacts on physical health, mental health, awareness and safety.	Adequate human resources are allocated to meet business needs. All employees sign Working Hours Opt Agreements. No worker is forced to work excessive hours. If longer hours are necessary, a fatigue risk assessment is performed, and compensatory rest is provided.
Entitlement to Work in Country of Employment	Workers may be employed without the necessary legal authorisation, potentially leading to forced expulsion	All workers have the right to work in the country of employment. Evidence of the right to work in the UK is provided, e.g., UK passport, UK birth certificate, work permit, or other suitable evidence recognised by the UK Borders Agency.
Working in poor physical working conditions	Poor working conditions can result in injury and ill health.	Safe and healthy working conditions will be provided to prevent work-related injuries and ill health. The company has an established health and safety policy and management system, certified by Safety Schemes in Procurement (SSIP) and PAS91 Common Assessment Standard (CAS) accreditation schemes, and is also preparing for ISO 45001 certification.
Bullying, discrimination, and harassment in the workplace.	Poor social conditions may lead to mental health issues and potentially physical harm.	Bullying, discrimination, and harassment are not tolerated in any form. The company promotes a respectful and safe working environment.

Note: *Spectrum Franchising Limited (t/a Rainbow Restoration UK) will continue to review and update risk control measures in accordance with changes to employment legislation, including the upcoming employment bill, and will conduct regular reviews to ensure compliance and the safeguarding of worker rights.*

DUE DILIGENCE IN THE SUPPLY CHAIN

As a medium-sized company, Spectrum Franchising Limited (t/a Rainbow Restoration UK) recognises that our ability to directly influence the supply chain is limited. However, we implement the following due diligence procedures to ensure compliance with modern slavery requirements in our supply chain:

- Our subcontractor evaluation form requires all subcontractors to declare their compliance with the Modern Slavery Act.
- Our contractual requirements stipulate that modern slavery is not permitted in any form.
- All of our direct suppliers are UK-based, with the majority being large national organisations.
- In the unlikely event that we directly procure products or services from high-risk countries, additional due diligence measures will be taken to ensure compliance with modern slavery standards.

CUSTOMER PARTNERSHIP EXPECTATIONS

We expect our customers to uphold the same ethical standards as we do, particularly with regard to the following:

- Providing realistic schedules of rates to ensure adequate financial resources are available to meet compliance obligations.
- Ensuring conformity with payment terms and conditions, as well as the timely payment of invoices.
- Providing safe and healthy working conditions to prevent work-related injury and ill health.
- Ensuring that no bullying, discrimination, or harassment is permitted or tolerated in the workplace.

KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

The risk control measures outlined above will be monitored as part of the annual strategic management review process to assess their effectiveness and ensure continuous improvement.

TRAINING ON MODERN SLAVERY AND TRAFFICKING

Directors and managers will be informed of their roles and responsibilities in relation to the elimination of modern slavery and trafficking through the communication of this Modern Slavery and Trafficking Policy.

Non-managerial workers will receive training and awareness on modern slavery and trafficking issues through Toolbox Talks, MiGateway e-learning courses and inclusion in Employee Awareness Handbooks.

NON-CONFORMITY & CORRECTIVE ACTIONS

Should an occurrence or potential occurrence of modern slavery be identified, either within Spectrum Franchising Limited (t/a Rainbow Restoration UK) related to employment practices or working conditions, or externally within the supply chain, the following corrective actions will be taken:

1. **Investigation:** A competent investigator will be appointed to lead the investigation. This will be external to Spectrum Franchising Limited (trading as Rainbow Restoration) who will appointed by the Managing Director and Leadership Team.
2. **Non-Conformity Reporting:** All non-conformities and concerns should be reported in line with the Whistleblowing Policy via the dedicated mailbox speakup@rainbowrestoration.co.uk These will be documented within the Corrective and Preventative Log, and the required corrective actions will be implemented in a timely manner.
3. **Whistleblowing Policy:** If modern slavery practices are not rectified, Spectrum Franchising Limited (t/a Rainbow Restoration UK) Whistleblowing Policy will be enacted, and the relevant authorities will be notified.

The following regulatory authorities and services are responsible for modern slavery and trafficking:

Regulatory Authority / Service	Website	Telephone
Modern Slavery Helpline	https://www.modernslaveryhelpline.org/report	08000 121 700
Advisory, Conciliation and Arbitration Service (ACAS)	https://www.acas.org.uk/contact	0300 123 1100
Crimestoppers	https://crimestoppers-uk.org/give-information/forms/give-information-anonymously	0800 555 111
Police (Non-Emergency Report)	How to report | Police.uk	101

REVIEW

This policy will be reviewed annually by the Directors to ensure its effectiveness and compliance with any legislative changes or emerging risks related to modern slavery.

Any necessary updates will be communicated to all employees, subcontractors, and relevant stakeholders to ensure ongoing awareness and compliance.

Spectrum Franchising Limited (t/a Rainbow Restoration UK) is committed to continuous improvement and will review the policy in response to feedback, audit findings, or changes within operational process and/or supply chain.

In the event of significant legislative changes, the policy will be updated to ensure compliance with current laws and best practices.

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