LONDON CLEANING & SUPPORT SERVICES LIMITED

Environmental, Social and Governance Policy

Reference	LCSS-POL-01
Version	1.0
Issue date	January 2026
Review date	January 2027
Owner	Patrick O. Sotuminu, Director
Approved by	Patrick O. Sotuminu, Director
Scope	All directors, employees, agency and temporary workers of LCSS; all LCSS premises and client sites; and suppliers to LCSS
Related documents	The policies listed in Schedule 1

1. Introduction

1.1 London Cleaning & Support Services Limited ("LCSS") provides cleaning and support services to hospitality and commercial clients across London, including front of house cleaning, commercial kitchen cleaning, kitchen porterage, public area attendants and logistics support. Much of this work is carried out at night and in guest-facing areas, where discretion, hygiene and reliability are essential.

1.2 This policy sets out the standards by which LCSS manages its environmental, social and governance ("ESG") responsibilities. It is supported by the policies listed in Schedule 1, each of which sets out the detailed arrangements for its subject.

1.3 LCSS does not subcontract its core services. Should that change, any subcontractor will be required to comply with this policy and the LCSS Supplier Code of Conduct before starting work. Where a client controls services within its building, such as waste collection, energy or water, LCSS supports the client's own objectives and provides the information the client requires.

2. The LCSS CLEAN Standard

2.1 LCSS organises its ESG commitments under five headings, which together form the LCSS CLEAN Standard.

	Heading	Commitment
C	Colleagues First	A safe, fair and supportive workplace for every colleague
L	Low-Impact Cleaning	High standards of hygiene with minimal use of chemicals, water, energy and materials
E	Ethics and Integrity	Lawful and ethical conduct in every part of the business and its supply chain
A	Accountability and Assurance	Performance that is measured, reported and open to verification
N	Neighbourhood and Network	A positive contribution to local communities and responsible supply chains

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3. Colleagues First

3.1 **Health and safety.** Every colleague receives health and safety training before starting work on site and refresher training every six months. Competence in COSHH, manual handling, fire and emergency procedures and the safe use of equipment is recorded on the LCSS training matrix.

3.2 **Incident management.** Accidents, injuries and near misses are reported, investigated and reviewed by the Director, and reportable incidents are notified in accordance with RIDDOR.

3.3 **Night and lone working.** Colleagues working alone or at night remain in contact with the Night Manager or a Team Leader throughout their shift and are given guidance on travelling safely at the end of late shifts.

3.4 **Pay and terms of employment.** Every colleague is employed under a written contract and paid no less than the statutory National Minimum Wage and National Living Wage. LCSS is committed to progressing towards the real London Living Wage and to accreditation as a Living Wage employer.

3.5 **Wellbeing.** The Director is directly accessible to every colleague and provides individual support, including adjustments to duties and shift patterns where appropriate. LCSS will provide access to an employee assistance programme and trained mental health first aiders.

3.6 **Dignity at work.** LCSS does not tolerate discrimination, harassment or bullying, including harassment by guests or members of the public. Team Leaders act on every report without delay, and any colleague may raise a concern in confidence directly with the Director.

3.7 **Development and recognition.** Vacancies and promotions are open to all and decided on merit. Outstanding performance is recognised through the LCSS Staff of the Month award. LCSS will offer nationally recognised cleaning qualifications and English language support to colleagues who wish to progress.

4. Low-Impact Cleaning

4.1 **Products and methods.** LCSS specifies EU Ecolabel-certified, biodegradable professional cleaning products as its standard range and uses steam and other chemical-free methods wherever they are effective.

4.2 **Resources and waste.** Colleagues conserve water and energy on every site, report leaks to the client immediately and segregate waste at source, supporting clients in meeting their Simpler Recycling obligations. Only licensed waste carriers are used.

4.3 **Low-carbon operations.** Operatives travel to work by public transport, bicycle or on foot; suppliers deliver directly to site; business travel is undertaken in a ULEZ-compliant hybrid vehicle; and LCSS operates a paperless office. LCSS will report its Scope 1, 2 and 3 emissions under the GHG Protocol, publish a Carbon Reduction Plan and set science-based targets consistent with net zero.

4.4 **Environmental management.** The detailed arrangements are set out in the LCSS Environmental Policy and Environmental Management Plan, which follow the plan-do-check-act approach of ISO 14001. LCSS will seek certification to that standard.

5. Ethics and Integrity

5.1 **Anti-bribery and fair competition.** LCSS prohibits bribery, corruption, fraud and anti-competitive conduct, and regulates gifts, hospitality and conflicts of interest, as set out in its Business Ethics and Anti-Bribery Policy.

5.2 **Modern slavery.** LCSS does not tolerate forced, bonded or child labour or human trafficking in its operations or supply chain. No worker is charged a recruitment fee, and LCSS never retains

a worker's identity documents or wages. LCSS will publish an annual Modern Slavery Statement on a voluntary basis.

5.3 **Right to work.** Every applicant is subject to right-to-work checks in accordance with Home Office guidance, applied consistently to all applicants.

5.4 **Confidentiality and guest privacy.** Every colleague is trained at induction in confidentiality, the control of keys and access cards and the protection of guest privacy.

5.5 **Data protection.** Personal data is processed in accordance with UK GDPR and the Data Protection Act 2018, and information is protected under the LCSS Information Security Policy.

5.6 **Speaking up.** Colleagues, clients and suppliers may raise concerns in confidence under the LCSS Whistleblowing Policy and are protected from retaliation.

5.7 **Client requirements.** LCSS complies with the supplier codes of conduct of the clients it serves.

5.8 **Compliance record.** LCSS has not been prosecuted or investigated for any environmental, health and safety, human rights or anti-corruption offence in the past five years and has not been affected by any labour dispute in the past three years.

6. Accountability and Assurance

6.1 **Quality management.** Team Leaders inspect each site daily against the agreed specification, managers walk each site with the client weekly, the Operations Manager visits every other day and the Director visits weekly. The arrangements are set out in the LCSS Quality Assurance Policy.

6.2 **Client reporting.** LCSS provides clients with the ESG information they need for their own reporting, including the products used and their certification, leaks reported, training completed and incidents, and participates in client sustainability committees on request.

6.3 **Business continuity.** Service resilience is maintained under the LCSS Business Continuity and Disaster Recovery Policy.

6.4 **Insurance.** LCSS holds Employers' Liability insurance and Public and Products Liability insurance, each with a limit of indemnity of £5 million.

6.5 **Independent verification.** LCSS will complete an assessment with a recognised independent supplier ESG rating platform and will publish an annual summary of its ESG performance on its website.

7. Neighbourhood and Network

7.1 **Local employment.** LCSS recruits locally wherever possible, which shortens journeys to work and supports the communities in which it operates. Its workforce reflects the diversity of London.

7.2 **Supply chain standards.** Suppliers are required to comply with the LCSS Supplier Code of Conduct. Key suppliers are assessed against it, and product sustainability certificates are held on file.

7.3 **Community partnership.** LCSS will establish a long-term partnership with a charity or community organisation by January 2027, contributing volunteering time and in-kind support.

7.4 **Pathways into work.** LCSS will create entry-level roles and training placements for local people facing barriers to employment, working with employment partners in Barking and Dagenham and East London.

7.5 **Supplier diversity.** LCSS will monitor and increase its spending with local and small businesses, social enterprises and businesses owned by women and people from minority ethnic backgrounds.

7.6 **Industry standards.** LCSS will join a recognised cleaning industry body and seek certification to ISO 45001.

8. Objectives and monitoring

8.1 The Director sets measurable objectives under each heading of the CLEAN Standard in an annual ESG Action Plan. Baselines are drawn from the first full year of data, and progress is reported in the annual ESG summary and to clients on request.

8.2 Performance is monitored using the following indicators:

(a) Colleagues First: health and safety training completion, accident and near-miss frequency, staff turnover, training hours and internal promotions;

(b) Low-Impact Cleaning: greenhouse gas emissions, the proportion of eco-certified products, leaks reported to clients and the proportion of colleagues commuting by public or active transport;

(c) Ethics and Integrity: completion of right-to-work checks, completion of ethics and modern slavery training, concerns raised and resolved, and data incidents;

(d) Accountability and Assurance: client satisfaction, client reviews held and independent rating results;

(e) Neighbourhood and Network: local recruitment, supplier assessments completed, spending with local and diverse suppliers and volunteering hours.

9. Responsibilities

Role	Responsibility
Director	Accountable for this policy; sets objectives, allocates resources and reviews performance quarterly
Operations Manager	Implements the policy across all sites and monitors compliance during site visits
Night Manager and Team Leaders	Brief colleagues at the start of each shift, carry out daily inspections and report incidents, leaks and waste issues
Data Protection Officer	Oversees data protection and information security
All colleagues	Comply with this policy and raise concerns or suggestions

10. Communication and review

10.1 This policy is explained to every colleague at induction and at refresher training, is provided to clients and suppliers, and is published on the LCSS website.

10.2 The Director reviews this policy at least annually, taking account of the views of colleagues, clients and other stakeholders, and sooner if there is a material change in the law or in the services LCSS provides.

Schedule 1: Supporting policies

Reference	Document	CLEAN heading
LCSS-POL-02	Environmental Policy	Low-Impact Cleaning
LCSS-POL-03	Environmental Management Plan	Low-Impact Cleaning

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Reference	Document	CLEAN heading
LCSS-POL-04	Health and Safety Policy	Colleagues First
LCSS-POL-05	Modern Slavery Policy	Ethics and Integrity
LCSS-POL-06	Equality, Diversity and Inclusion Policy	Colleagues First
LCSS-POL-07	Recruitment and Selection Policy	Colleagues First
LCSS-POL-08	Data Protection Policy	Ethics and Integrity
LCSS-POL-09	Information Security Policy	Ethics and Integrity
LCSS-POL-10	Business Ethics and Anti-Bribery Policy	Ethics and Integrity
LCSS-POL-11	Whistleblowing Policy	Ethics and Integrity
LCSS-POL-12	Supplier Code of Conduct	Neighbourhood and Network
LCSS-POL-13	Quality Assurance Policy	Accountability and Assurance
LCSS-POL-14	Business Continuity and Disaster Recovery Policy	Accountability and Assurance

Schedule 2: Alignment with recognised frameworks

Framework	Alignment
UN Sustainable Development Goals	Colleagues First: 3, 4, 5, 8, 10. Low-Impact Cleaning: 6, 7, 11, 12, 13. Ethics and Integrity: 8, 16. Accountability and Assurance: 12, 17. Neighbourhood and Network: 1, 8, 10, 11, 17
Supplier ESG rating themes	Environment (Low-Impact Cleaning); labour and human rights (Colleagues First); ethics (Ethics and Integrity); sustainable procurement (Neighbourhood and Network)
ISO 14001 and ISO 45001	Plan-do-check-act management of environmental and health and safety performance
GHG Protocol	Measurement and reporting of greenhouse gas emissions
UK legislation	Health and Safety at Work etc. Act 1974; Control of Substances Hazardous to Health Regulations 2002; RIDDOR 2013; Food Safety and Hygiene (England) Regulations 2013; Environmental Protection Act 1990; Hazardous Waste (England and Wales) Regulations 2005; Environment Act 2021; Modern Slavery Act 2015; Equality Act 2010; Immigration, Asylum and Nationality Act 2006; Bribery Act 2010; Competition Act 1998; Public Interest Disclosure Act 1998; UK GDPR and Data Protection Act 2018

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Approval

Approved for and on behalf of London Cleaning & Support Services Limited.

Signature .....

Name Patrick O. Sotuminu

Position Director

Date 27/01/2026.....