Modern Slavery Policy

Effective Date: Updated July 2026
Company Name: Carbana Limited T/A Carbana Car Wash

1. Policy Statement

Carbana Limited is fully committed to preventing modern slavery and human trafficking within our operations and supply chains. We operate a zero-tolerance policy toward any form of forced labour, servitude, human trafficking, or exploitation. We are dedicated to acting ethically, transparently, and with integrity in all our business dealings across all our UK locations.

2. Scope

This policy applies to all individuals working for us or on our behalf in any capacity. This includes employees at all levels, directors, officers, site managers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, and third-party suppliers.

3. Core UK Employment Standards

We ensure that our car wash operations strictly adhere to the following labour standards in accordance with UK law:

- **Voluntary Employment**: All work must be voluntary. Workers must not be forced to work through threats, coercion, or psychological pressure.
- **Statutory Wages**: All employees are paid at least the **UK National Minimum Wage** or **National Living Wage**, as applicable. Wages are paid directly to the workers' personal bank accounts, never to a third party.
- **Reasonable Hours**: Working hours must comply with the **UK Working Time Regulations 1998**. Overtime must be voluntary and compensated fairly.
- **Identity Documents**: We never withhold or confiscate original identification documents, passports, or work permits. Workers always retain possession of their documents.
- **Right to Work**: Robust right-to-work checks are conducted via the official **Home Office** online service or valid physical document verification before employment commences.
- **Freedom of Movement**: Workers are free to leave the workplace at the end of their shift and are free to terminate their employment with reasonable notice.

4. Supplier Due Diligence

The car wash sector relies on various suppliers for chemicals, equipment, and utility services. We expect our suppliers to hold their own supply chains to the same high standards. We reserve the right to terminate relationships with suppliers who fail to demonstrate a commitment to eradicating modern slavery.

5. Identifying Red Flags

All staff and management across all regional sites are trained to watch for signs of modern slavery, which in a UK car wash environment may include:

- Workers who appear frightened, withdrawn, or unwilling to interact with customers.
- Individuals showing signs of physical abuse, neglect, or lack of proper personal protective equipment (PPE).
- Workers arriving and leaving together in group transport or living in overcrowded accommodation provided by an employer.
- Individuals who allow someone else to speak on their behalf or do not hold their own documentation.

6. Reporting Mechanism

If you suspect that someone is being exploited or subjected to modern slavery within our business or supply chain, you must report it immediately to the **Chief Operating Officer**.

Reports can be made confidentially. No worker will suffer retaliation, retribution, or detrimental treatment for reporting a genuine suspicion of modern slavery.

External Reporting Channels

If you prefer to report externally, or if you feel the internal report was not handled correctly, you can contact:

- **Modern Slavery Helpline**: Call **08000 121 700** or report online via the Unseen UK Website.
- **The Police**: Call **101** for non-emergencies.

If there is an immediate danger to life or a crime is taking place, contact emergency services directly by calling **999**.

7. Performance and Review

This policy will be reviewed annually by management to ensure its effectiveness, relevance, and alignment with updated legal requirements.