



Modern Day Slavery

Policy Statement

Purpose

The purpose of this Policy is to specify details of First Recruitment Group's approach to fulfilling its commitment to support the elimination of Modern Slavery and fully meet its obligation under the Modern Slavery Act 2015.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. First Recruitment Group Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

First Recruitment Group was formed in 1997 and is a leading global recruitment agency specialising in recruitment from boardroom to base, with a group turnover of over £100m. Our UK headquarters are based in Birchwood, Warrington; we also have office located in, Albania, Australia, Kenya, Ghana and Thailand.

We specialise in providing blue and white collar recruitment, meeting the needs of our clients in the Energy, Infrastructure, Chemicals, Manufacturing and Aerospace & Defence sectors. Whilst having an area of specialism within engineering positions we also support clients by providing recruitment for Commercial, Technology, Finance and HR roles; this enables our clients to achieve their recruitment requirements from one provider.

We have over 70 employees worldwide, 40 of which are experienced recruitment consultants, specialising within each of our sectors. We have a database of over 150,000 registered candidates and 1000 active contractors on assignments around the world; First Recruitment meets the staffing requirements of a broad range of named customers, as well as retaining a significant candidate database.

We liaise with our clients to propose the most appropriate services which would enable them to meet their recruitment needs. Our main recruitment services are listed below.

- Project Consultation
- Managed Solutions
- Contract Placements
- Permanent Placements
- Mobilisation
- Payroll and Tax
- Account Management

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Responsibilities

Overall responsibility for setting the parameters of this policy and ensuring its implementation sits with **John Urpi, Chief Executive Officer (CEO)**.

Responsibility for updating the policy in line with current statutory obligations and requirements, and industry best practice sits with **John Urpi, CEO**.

Responsibility for ensuring this policy and any future updates to it are read by all current and future employees sits with individual line managers and or Human Resources at Induction.

All employees must read and understand their responsibilities under this policy. If an employee is not entirely clear about their responsibilities under this policy they should contact HR Representative to request further clarification or training as necessary.

All employees have a responsibility to act in accordance with this policy and to report any suspected act, or potential act of modern slavery as soon as they become aware of it.

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our suppliers

First Technical Recruitment Group operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

What to do if Modern Slavery is discovered:

Where we receive a complaint involving suspected Modern Slavery, we will act quickly to investigate this in line with the framework and responsibilities of our existing procedure.

All employees have a responsibility to help detect, report and prevent instances of suspected Modern Slavery. To facilitate this we have put in place a safe, reliable, and **confidential** method to allow employees to confidently report any suspicious activity, which they feel may be in breach of this policy. We want all employees be aware that they can raise their concerns without fear of reprisal.

If you believe you have good reason to suspect a colleague, contractor or another person of Modern Slavery or an offence involving a serious infringement of company rules you should discuss this in the first instance, and in confidence, with your line manager or go to a board director. If for any reason the employee does not feel able to raise their concerns with a senior manager or director they should speak directly to the HR manager:

Compliance

We will review this policy on a regular basis to ensure its relevance and effectiveness.

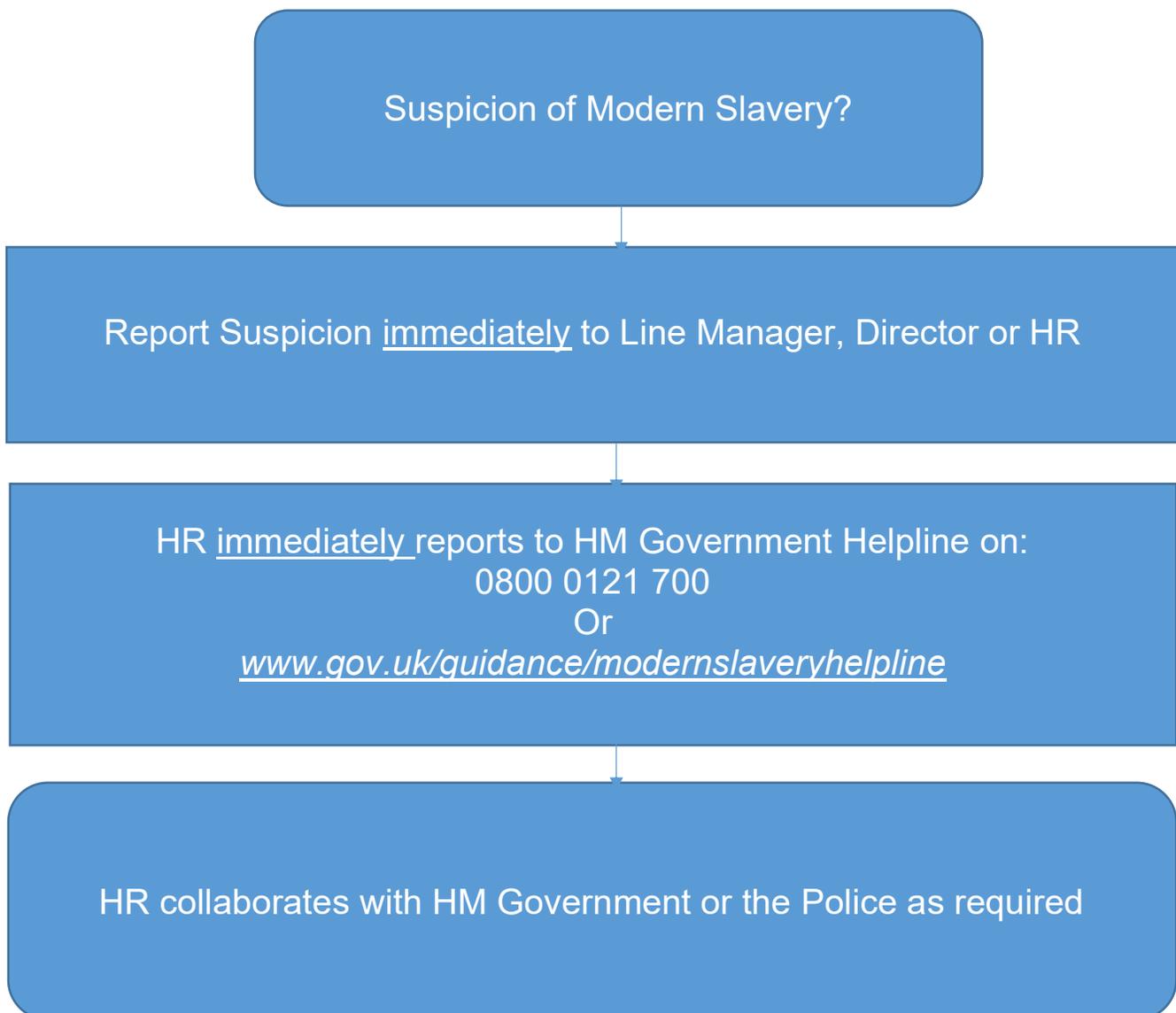
If an employee is found to have acted improperly or behaved in a manner which is in contravention of this policy, s/he will be subject to the company's disciplinary policy, and such behaviour could lead to disciplinary action.

Any queries regarding this policy should be raised in the first instance with **John Urpi, CEO**.

Review

The effectiveness of this policy and associated arrangements will be reviewed under the direct supervision of the Company Chief Executive, on an annual basis unless dictated by Legislation.

Suspicion of Modern Slavery: Escalation Process:





Signed

Name: John Urpi

Title: CEO

Date: 12.02.19

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