



Modern Day Slavery

Policy Statement

Purpose:

This Policy confirms First Recruitment Group's commitment to supporting the elimination of Modern Slavery and fully meeting its obligations under the Modern Slavery Act 2015.

What is Modern Slavery?

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. First Recruitment Group 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 within the business or our supply chain.

First Recruitment Group will not support or deal with any business knowingly involved in slavery or human trafficking.

Responsibilities:

Overall responsibility for this policy and ensuring its implementation sits with **David Robertson Managing Director**.

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 the company 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.

Our Commitment and Control Measures:

Area:	Objective/KPI:
Modern Day Slavery Statement (Legal requirement for UK companies with turnover of minimum £36m)	Annually review within 6 months of financial year-end
	Publish new statement on UK Government Registry & complete associated questionnaire
	Publish new statement on all group websites
	Communicate new statement to all group employees including overseas
Risk assessment	Conduct periodic risk assessment
Modern Day Slavery Policy	Periodically review to ensure it remains valid
Training	Ensure every new employee receives the modern slavery induction
Training	Provide periodic refresher training
Recruitment processes	Recruitment processes are in place to check appropriate IDs, credentials, and right- to- work for our employees and candidates for our clients
Supply chain due diligence	Ensure all in-scope suppliers complete <i>Critical Supplier Approval Form</i>
Annual CSR Report	Create & publish for previous financial year
Risk, Change and Complaints Log	Record any modern-day slavery key issues; report any concerns
Management Review	Communicate any key issues/trends/concerns to senior management and consider any lessons learned

What to do if Modern Slavery is discovered:

Where we receive a complaint involving suspected Modern Slavery, we will act quickly to investigate this (See Addendum “Escalation Process”).

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 and **confidential** method to allow employees to confidently report any suspicious activity, where 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, supplier 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 in-line with our *Whistleblowing Policy*.

Compliance:

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

Related Governance Documents:

- *Annual CSR Report*
- *Anti-Bribery Policy*
- *Code of Ethical Business Conduct*
- *Critical Supplier Approval & Monitoring Process*
- *Escalation Process: Suspicion of Modern Slavery (addendum)*
- *Governance Policy Framework*
- *Recruitment Policy*
- *Whistleblowing Policy*

Addendum:

Suspicion of Modern Slavery: Escalation Process:

Suspicion of Modern Slavery?

Report your suspicion or concern immediately to your line manager, HR or a director noting that you can do so with no fear of reprisals or negative consequences

HR and senior management review concerns

Where appropriate company will report as soon as possible to HM Government Helpline on:
0800 0121 700
Or
www.gov.uk/guidance/modernslaveryhelpline

Company collaborates with authorities as required



M.D.

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