

# MODERN SLAVERY POLICY

## 1. INTRODUCTION

- 1.1. We are committed to improving our practices to combat slavery and human trafficking.
- 1.2. As a business which is involved in the placement of people in temporary work, sometimes engaging temporary workers from outside of the United Kingdom for whom English is not their first language, we recognise the risk of slavery and human trafficking within our industry sector.
- 1.3. Through consistency in our business practices, staff training and vigilance, we will take all reasonable steps to minimise the risk of slavery and human trafficking in our supply chains.
- 1.4. You must read this policy if you are an employee, director, consultant, agency worker, or an employment intermediary or other supplier to our business.
- 1.5. Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you.

## 2. OUR SUPPLY CHAINS

- 2.1. Our supply chains involve the supply of:
  - 2.1.1. temporary workers through umbrella companies and other intermediaries;
  - 2.1.2. temporary labour through subcontracting businesses.
- 2.2. As a professional services business, we are not involved in the manufacture of goods. The purchasing of goods is incidental to our business and we ensure that goods are sourced through reputable and ethical suppliers from the United Kingdom and the European Union.

## 3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

- 3.1. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- 3.2. We have in place systems to:
  - 3.2.1. Identify and assess potential risk areas in our supply chains.
  - 3.2.2. Mitigate the risk of slavery and human trafficking occurring in our supply chains.
  - 3.2.3. Monitor potential risk areas in our supply chains.
  - 3.2.4. Protect whistle blowers.
- 3.3. As part of our initiative to identify and mitigate risk we ensure that we do not place temporary workers unless:
  - 3.3.1. They have registered with us personally and not through any third party other than a bona-fide subcontractor which has satisfied our due diligence checks;
  - 3.3.2. They produce original copies of their identification and proof of right to work and are not dependent upon any third party providing these documents on their behalf;
  - 3.3.3. Their remuneration is being paid into their own bank account, unless there is a clearly justifiable reason for the remuneration being paid to a third party;
  - 3.3.4. We are satisfied that they:
    - 3.3.4.1. have freely agreed to perform the temporary assignment;
    - 3.3.4.2. understand the nature of the assignment which they are agreeing to perform; and
    - 3.3.4.3. are not subject to any undue coercion or control by any third party.
  - 3.3.5. We are satisfied that there are no other risk indicators such as multiple temporary workers registering from the same address, multiple temporary workers being dependent upon transport from the same person, or the temporary workers showing signs of fear, distress, or mistreatment.

#### **4. SUPPLIER ADHERENCE**

4.1. We have a zero-tolerance approach to slavery and human trafficking and require our suppliers, including umbrella companies and CIS intermediaries to:

4.1.1. Comply with strict contractual requirements relating to the prevention of modern slavery;

4.1.2. Have in place and provide on demand evidence of the procedures which they have adopted to combat modern slavery and human trafficking within their own business operations and supply chains.

#### **5. TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff. We also expect our business partners to provide training to their staff.

#### **6. QUESTIONS & COMMENTS**

6.1. Questions or comments about this policy are welcomed and, where applicable, should be referred by employees to their line manager.

6.2. Other interested parties should contact the Managing Director at [tony@nationwidetradesandlabour.co.uk](mailto:tony@nationwidetradesandlabour.co.uk) or by using our Contact Form.