

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

1. INTRODUCTION FROM THE FINANCE & QUALITY DIRECTOR

EasyRecruitUK as a company operates as a Recruitment Business and Agency employing directly large numbers of ‘flexible employees’ to work at various client organisations across various business sectors.

We expect all who have, or seek to have, a business relationship with EasyRecruitUK and/or any member of our company, to familiarise themselves with our anti-slavery values and to act at all times in a way which is consistent with our anti-slavery values.

We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude from all staff who works for us.

Our attitude to modern slavery is: zero tolerance.

2. PURPOSE OF THIS POLICY

2.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of EasyRecruituk.com Limited with the aim of prevention of opportunities for modern slavery to occur within its business. This policy’s use of the term “modern slavery” has the meaning given in the Act.

2.2 As a company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business activities and relationships towards implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or those of our suppliers.

3. STEPS FOR THE PREVENTION OF MODERN SLAVERY

3.1 As part of our commitment to tackling modern slavery and human trafficking, we have in place systems to:

3.1.1 Identify, mitigate and monitor potential risk areas when recruiting Flexible Workers by reviewing their response to the Worker’s Questionnaire outlining Pay, Treatment, Accommodation & Food and Travel which will be conducted strictly within a controlled environment;

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- 3.1.2 Weekly computerised reports generated by our Head Office Quality Department to identify and monitor potential risk areas by checking key areas;
 - 3.1.3 Build long-standing relationships with our Clients;
 - 3.1.4 Encourage the reporting of any wrong doing through internal and external whistle blowing Procedures;
 - 3.1.5 Protect whistleblowers;
 - 3.1.6 Continually look at ways to improve our monitoring procedures.
- 3.2 Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our organisation or supply chains at the earliest possible stage to the Quality Department at Head Office.
- 3.4 All staff team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented.
- 3.5 Adherence to this policy forms part of all staff team members' induction when they start their employment with EasyRecruitUK.

4. RESPONSIBILITY FOR THE POLICY

- 4.1 Ultimate accountability for the prevention and prevention of modern slavery rests with the Company's Board of Directors. The Finance & Quality Director of the Company has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.
- 4.2 Line Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and updated training on it and the issue of modern slavery.

5. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

- 5.1 Whistle blowing Procedure – direct access to senior leadership.

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The Company's Whistle blowing Procedure is intended to provide guidance to employees on how concerns can be communicated to the Company. Full procedure can be found in Section 4.1 of the Employee Handbook.

Concerns about suspected modern slavery associated with the Company may be reported by employees in this manner.

In summary, employees should initially approach Line Management. If the matter is extremely serious then a director of the Company should be approached. The nature of the complaint will determine the Company's next course of action.

Circumstances:-

- You suspect a person acting on behalf of EasyRecruitUK is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of EasyRecruitUK who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of EasyRecruitUK is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

The Modern Slavery Act 2015 is available to view at:

http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf

6. SAFEGUARDS

- 6.1 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery in whatever form is or may be taking place in any part of our own business or in any of our supply chains.
- 6.2 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- 6.3 The Company will accept and take seriously concerns communicated anonymously, however, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.
- 6.4 Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

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7. COMMUNICATION AND AWARENESS OF THIS POLICY

- 7.1 Our zero-tolerance approach to modern slavery will be communicated to all existing clients at the outset and reinforced as appropriate thereafter.
- 7.2 We will continually use the 'Stronger Together' leaflets provided and hang relevant posters on the walls to increase awareness.

8. TRAINING

- 8.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide training to all members of staff.
- 8.2 We have built into our induction program training content to ensure we have a consistent approach to tackling modern slavery in our business.

9. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

- 9.1 We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business;
- Completion of frequent premises Audits by Quality Department;
 - Use of labour monitoring and database systems to check eligibility of employees in the UK; *and*
 - Weekly System Checks completed at Head Office

10. REVIEW

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's slavery and human trafficking statement. Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis and may be amended from time to time.

Date of Initial Adoption: 14th October 2016

2nd Review Completed: 15th November 2021



Signed: _____

Position: Chief Executive Officer
For and on behalf of Easyrecruituk.com Limited