

Modern Slavery Policy

Anti-slavery and human trafficking policy

1. Policy statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our partners, clients or supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our clients, contractors, suppliers and other business partners, we prohibit the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our business partners, contractors, suppliers and clients will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, casual workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2. Responsibility for the policy

- 2.1 The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 All employees have a primary and day-to-day responsibility for implementing this policy.
- 2.3 Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.
- 2.4 We invite comment on this policy and suggestions for improvement. Comments, suggestions and queries are encouraged and should be addressed to the HR.

3. Compliance with the policy

- 3.1 All employees must ensure that they read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. They are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 Employees must notify a manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 3.4 Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If employees believe or suspect a breach of this policy has occurred or that it may occur, they must notify their manager or report it as soon as possible.
- 3.6 If employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our business constitutes any of the various forms of modern slavery, they are advised to raise it with HR.
- 3.7 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 of whatever form is or may be taking place in any part of our own business or in any of our supply chains, client's businesses, contractors or partners businesses. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR immediately.

4. Communication and awareness of this policy

- 4.1 Training on this policy, and on the risk our business faces from modern slavery is given and regular training will be provided as necessary.
- 4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, clients and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Due Diligence

- 5.1 We undertake due diligence throughout the business by taking the following approaches:
 - Requiring all employees to complete Modern Slavery Awareness eLearning, with a refresher where changes or updates are made

- The Casual Recruitment Teams are all instructed in Modern Slavery Awareness and are presented with resource reading material
- Off to Work have multiple policies in place to support conducting business in an ethical and transparent manner such as an Equal Opportunities Policy, a Whistleblowing Policy and a Recruitment & Selection Policy. This includes performing checks including Right to Work & obtaining suitable references to safeguard against human trafficking or being forced to work against their will
- Internal procedures on the Workforce Management System allow for alerts when duplicate bank details, addresses or next of kin information is entered which is investigated where necessary
- Off to Work Payroll will only pay into accounts that match the team member's name on their Right to Work documentation

6. Breaches of this policy

6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2 We may terminate our relationship with other individuals, clients, contractors and organisations working on our behalf if they breach this policy.

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