

## Premier Recruitment Solutions Limited

### SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

#### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

##### Introduction

This statement sets out Premier Recruitment Solutions' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

As part of recruitment industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

##### Organisational structure and supply chains

This statement covers the activities of Premier Recruitment Solutions Limited:

- Premier Recruitment Solutions Ltd was established in 2005 to satisfy customer's recruitment requirements in the construction industry and is a company based on the philosophy of consistent and never ending improvement. This business has developed well and is expanding successfully.

Premier Recruitment Solutions Ltd aim is to achieve sustained, profitable growth by providing recruitment services which consistently satisfy the needs and expectations of its customers in terms of delivery and quality. This level of quality is achieved through adoption of a system of procedures that reflect the competence of the Company to existing customers and potential customers.

The company's main suppliers are companies providing payroll intermediary services. We have an approved list of such suppliers and each one is audited and suitably vetted to ensure that any people supplied are not done so in contravention of any UK laws including but not limited to slavery and human trafficking.

##### Countries of operation and supply

The organisation currently operates in the following countries:

- UK

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- We utilise a risk assessment template with a risk description and an Impact then identifying a Likelihood score and an Impact score to then calculate a risk score. We then look at control measures and on that basis re-evaluate the risk score. We only operate in the UK and as such the risk is lower than if we operated internationally. However, we do operate in the construction recruitment business which can be considered to be a high risk for slavery or human trafficking if not adequately controlled.

## High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- The utilisation of third party payroll intermediaries to provide labour.

## Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- Policies: Business Advisor along with the Managing Director
- Risk assessments: Business Advisor along with the Operations Director
- Investigations/due diligence: Business Advisor along with the Operations Director
- Training: Business Advisor. The organisations staff have undergone in-house training, webinars and workshops run by stronger together. We have been a GLA licenced organisation for over 8 years and through that the staff also have developed awareness of the issues. We have been audited by a variety of clients and have worked with them to improve checking and whistleblowing procedures.

## Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- Whistleblowing policy

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete a confidential disclosure form.

- Employee code of conduct

The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

- Supplier code of conduct

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

- Third Party payroll intermediaries' policy

The organisation uses only specified, reputable third party payroll intermediaries to source labour and always verifies the practices of any new third party it is using before accepting workers from that party.

## Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular [such as participation in "Stronger together" initiatives];

## Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring all staff to have completed training on modern slavery by June 2017;
- developing a system for supply chain verification in place since December 2016, whereby the organisation evaluates potential suppliers before they enter the supply chain
- reviewing its existing supply chains completed in December 2016, whereby the organisation evaluates all existing suppliers.

## Training

The organisation requires all staff within the organisation to complete training on modern slavery.

The organisation's modern slavery training:

- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent the use of labour engaged on unrealistically low wages or wages;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Gangmasters Licensing Authority and "Stronger together" initiative;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

### Awareness-raising programme

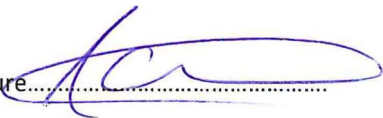
As well as training staff, the organisation has raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Gangmasters Licensing Authority.

### Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

Signature.......... Date.....20/11/19.....

Position.....DIRECTOR.....

This policy is reviewed on a periodic basis.