Modern Slavery Policy

Careermakers Recruitment (UK) Limited

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1. Purpose

This policy outlines Careermakers Recruitment (UK) Limited's commitment to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We fully support the aims of the **Modern Slavery Act 2015** and actively work to prevent any form of forced labour, servitude, or exploitation.

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2. Scope

This policy applies to:

- All employees and office staff
- Temporary and agency workers
- Umbrella and CIS subcontractors
- Directors and senior managers
- Clients and supply chain partners

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3. Definition of Modern Slavery

Modern slavery includes but is not limited to:

- Human trafficking
- Forced or bonded labour
- Domestic servitude
- Exploitation of vulnerable persons
- Withholding identity documents or wages

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4. Our Zero-Tolerance Approach

Careermakers Recruitment (UK) Limited takes a zero-tolerance approach to modern slavery and human trafficking. We:

- Do not tolerate any form of forced or involuntary labour
- Expect all partners and suppliers to adhere to the same standards
- Will cease trading with any party found to be involved in or turning a blind eye to modern slavery

5. Risk Assessment

We regularly assess our exposure to modern slavery risks by reviewing:

- Worker origin and visa status
- Housing, transport, and bank account details
- Sectors and locations with increased vulnerability
- Supplier and subcontractor employment models

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6. Prevention Measures

We take the following steps to mitigate the risk of modern slavery:

- Conduct right-to-work checks using official documents
- Use SafeRec to verify payslip transparency and umbrella deductions
- Require suppliers to confirm anti-slavery compliance in writing
- Monitor shared addresses, mobile numbers, or bank accounts flagged as high-risk
- Provide escalation channels to report concerns

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7. Training & Communication

- Staff are trained during onboarding and annually on how to identify and report signs of modern slavery
- Site welfare calls include probing for red flags or coercion indicators
- Posters and guidance materials are available in common languages across sites

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8. Reporting Concerns

If anyone suspects modern slavery or unethical labour practices, they must report it immediately. Concerns can be reported confidentially to:

John Webb
Operations Director
john.webb@career-makers.co.uk

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9. Consequences of Breach

- Internal disciplinary action (up to dismissal) for complicity or failure to act
- Immediate removal of suppliers from PSL

- Reporting to law enforcement and/or the Gangmasters and Labour Abuse Authority (GLAA)

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10. Review and Audit

This policy will be:

- Reviewed annually by the Compliance Department
- Audited as part of our PSL and umbrella supplier reviews
- Updated in response to legislation or identified process weaknesses

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Name: _____

Position: _____

Signature: _____

Date: _____