

Modern Slavery Policy

Definition: What is Modern Slavery?

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. Both have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Policy Scope

This policy applies to all persons working for or on behalf of Daniel Owen and all subsidiaries (collectively known as the Company) in any capacity, including all permanent and temporary employees at all levels, directors, agency workers and contractors.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Statement

As a recruitment business providing temporary, long term and permanent workers and contractors to the Construction, Property Services and Rail markets, Daniel Owen operates a zero-tolerance approach to modern slavery and is fully committed to acting ethically and with integrity in all business dealings and relationships.

The company has established internal systems and enforcement controls to ensure modern slavery is not taking place anywhere within its own business or supply chain. The Company recognises its responsibility to be alert to the risks of modern slavery and to ensure that its workers and employees are not being exploited; that they are safe and that the relevant legislation relating to wage, human rights and international standards are adhered to, including freedom of movement and communications. Whilst workers' health and safety, working hours and welfare at work remains the responsibility of the hiring client whilst on site or at work, the Company recognises its duty to act on any concerns raised relating to its workers.

The Company provides training for its employees to raise awareness of the signs that may identify that an individual is, or is at risk of being, a victim of modern slavery and are instructed on how to report any issues that may be raised with them in this respect. The Company's objective is to promote a culture of trust between its employees, its clients and its workers, where workers are valued and treated with dignity and respect and paid fairly and on time.

The Company recognises that job-finding fees are a business cost and will not allow these to be paid by job applicants.

The Company is committed to promoting awareness of the risks of modern slavery and provides information to encourage reporting of forced labour issues, in multiple languages, in its offices and to its workers. The Company will work co-operatively with enforcement authorities to address any concerns raised relating to modern slavery. This includes the police and GLAA (Gangmaster and Labour Abuse Authority.) The Company is a signatory to the GLAA Construction Protocol, a joint information sharing agreement between construction businesses aimed at eradicating slavery and labour exploitation in the building industry. The Company is registered as a Stronger Together Business Partner.

Modern Slavery and hidden labour exploitation is an agenda item at Quarterly Health & Safety meetings and is documented on the Company's risk register and complaints tracker, reviewed monthly by the Board of Directors.

Compliance and Vetting Procedures

As a recruitment business we recognise that the main risks of modern slavery lie within our provision of temporary labour to the construction industry and therefore have an audit process in place for our payment supply chain as well as a dedicated Compliance team, responsible for carrying out all worker checks.

We source candidates for a wide range of clients in the Construction, Property Services and Rail markets and have rigorous checks in place to ensure that all candidates are fully vetted before being placed. The complex nature of construction payment schemes means that the company has different strategies in place for different worker groups to ensure that risks of engaging workers that may be victim of human trafficking or modern slavery are eradicated.

Whether we pay direct or via an intermediary, all payments comply with the minimum and national living wage rates applicable and in force at the time the work is carried out. The Company adheres to guidance from the Border Agency in carrying out its right to work checks and our Compliance and Management teams have undertaken training to ensure up to date knowledge of current documentation checking processes.

The Company regularly audits worker details, including addresses and contact details, next of kin and banking information and requires its intermediaries to do the same, to enable early identification of any potential irregularities.

All Company employees complete a compliance and legislation training session as part of our induction process. This includes an awareness session on Modern Slavery using Stronger Together training resources. The training covers identifying signs of modern slavery and how to raise and report a concern.

Responsibility

The CFO has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they create effective precaution to counteract any risks associated with modern slavery. The CFO has attended Stronger Together's training 'Tackling Modern Slavery in the Construction Sector'.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Training and information relating to our duties to counter modern slavery within our industry are covered in our Induction Training programme.

All employees must ensure that that they have read, understood and comply with this policy.

Reporting and Handling of Modern Slavery and Labour Exploitation

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. All employees or persons working for or on behalf of the Company have a duty to raise any concerns they may have, or concerns that are raised to them, about any issue of suspicion of modern slavery in any parts of our business, our supply chain or whom we supply, at the earliest possible stage to the CFO or COO. Where language support is required the Company will provide the services of either an internal interpreter or a trusted external person to facilitate.

Following the report of any Modern Slavery related issue or concern, the CFO will assign responsibility for investigation and any necessary action, according to the nature of the issue. The priority focus at all times will be to ensure the protection of the potential victim.

This policy will be reviewed annually or sooner should the need arise.

Signed:



Name: Suzanne Jellyman

Position: CFO

Date: 23rd July 2026

Other Contact Details

Modern Slavery Helpline: 08000 121 700

Gangmaster and Labour Abuse Authority: 0800 432 0804

Stronger Together (resources and information): <https://www.stronger2gether.org/>