

Modern Slavery & Human Trafficking Statement

Introduction

Orange Genie is a UK based provider of outsourced contractor management services, providing outsourced employment for recruitment agencies and other businesses, giving them the freedom to focus on their core business activities. We provide employment to contractors/freelancers who want the flexibility of contracting with the security of employment and Accountancy services to those who want the independence of running their own business. We also provide support to those operating on a self employed basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement and has been approved by the management of Orange Genie Group Ltd ("Orange Genie")

Our commitment

Orange Genie is committed to continuously improving our practices to ensure that modern slavery and human trafficking are not present within our own organisation or our supply chains.

Orange Genie do not believe there is any place in today's world for slavery or human trafficking. We all have a responsibly to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them. Orange Genie is committed to acting ethically and with integrity in all our business relationships

We choose to engage and partner with like-minded organisations because they recognise people should be treated with dignity and respect. We are committed to continually improving our practices to combat slavery and human trafficking and to encourage the same high standards from our supply chain and business partners.

Our Supply Chains

We believe our highest areas of potential risk are within our supply chains, and in the provision of contingent labour. Orange Genie operate across a wide range of industry sectors, in business areas we have identified as having the potential for an increased risk of modern slavery and human trafficking issues we endeavour to mitigate those risks by ensuring that the knowledge and experience of our staff is supported by robust back office procedures.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Processes

In order to mitigate our supply chain risk, we work with our suppliers and business partners to confirm that they (and their supply chain) comply with Modern Slavery and Human Trafficking legislation as part of their contractual relationship with Orange Genie.

Failure by a supplier to provide a positive response in relation to the above will lead to an investigation and may result in the suppliers contract being terminated.

Modern Slavery & Human Trafficking Statement

We take a risk-based approach in identifying those supply chains we consider the exposure to be greatest. Our internal systems involve:

- (1) Proactively monitoring our payroll systems to identify where contingent workers may be sharing bank accounts, addresses or telephone numbers as this can be an indication of illegal or unethical behaviour.
- (2) Proactively managing every employee to ensure they are paid, at least, national minimum wage.
- (3) Conducting rigorous pre-employment checks including eligibility to work, references, qualifications and proof of national insurance numbers.
- (4) Undertaking rigorous induction training with all stakeholders to ensure they understand the nature of their relationship with Orange Genie and that they are aware of their rights.
- (5) Informing all stakeholders of the systems we have in place to encourage the reporting of concerns and the protection of whistle blowers.
- (6) We ensure that we do not hold onto our workers' identification documents or knowingly work with businesses that do.

If a problem is identified we will work together with the supply chain to address any areas of concern, and if necessary will remove them as a supplier or, in the case of a business partner, we will resign from the supply chain.

Adherence to Our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to staff that is relevant to their role. The aim of this training is to increase awareness of human slavery issues and to help those members of staff understand them and be alert to relevant indicators, their relevance to Orange Genie and their role in managing them in accordance with our values.

We will continue to work closely with our business partners to likewise provide training to their staff and suppliers.

Incidents relating to the last financial year.

No incidents of modern slavery or human trafficking have been reported by Orange Genie or suppliers to Orange Genie during the period of our last reported financial year.

Planned activities

Following a review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to undertake further action throughout 2022/23.

- Incorporate Anti Slavery and Human Trafficking awareness as part of the new staff onboarding process for new Orange Genie Admin Ltd starters to further raise awareness of the matter.

Modern Slavery & Human Trafficking Statement

- Deliver refresher training to all staff regarding the risks of modern slavery and human trafficking within the business and associated supply chains.
- Regular auditing of right to work documentation.
- Continue to conduct due diligence procedures on any new supplier/agency/end client.

In order to assess the effectiveness of the measures taken by Orange Genie, we will regularly review and refine our policies and procedures in relation to modern slavery and human trafficking and will include updates on any actions we take in future statements.

This statement applies to Orange Genie Group Ltd and constitutes Orange Genie's modern slavery and human trafficking statement for the financial year ending 30th September 2022.