

MODERN SLAVERY STATEMENT

1. INTRODUCTION

- 1.1 SourceCo Recruitment Ltd has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains.
- 1.2 SourceCo Recruitment Ltd operates as an employment business, predominantly sourcing and supplying both skilled and unskilled staff for the temporary labour market and fast-moving consumer groups (FMCG) sectors. We are aware of the potential for being targeted by traffickers and unlicensed gangmasters. Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, in order that we may take the necessary action promptly and effectively should it be identified.
- 1.3 SourceCo Recruitment Ltd accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

2. COMPANY POLICY

- 2.1 SourceCo Recruitment Ltd is committed to ensuring that we take all reasonable steps to ensure that there is no modern slavery or human trafficking within our business
- 2.2 Workers are free to choose to work for their employer and to leave their employment upon reasonable notice.
- 2.3 All workers will be provided with a clear contract of employment, which complies with local legislation.
- 2.4 All workers will be treated in a fair and equal manner and with dignity and respect.
- 2.5 Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality) disability, sexual orientation, having or not having dependents, religious belief or political opinion, age, trade union activity and offending background will be prohibited.
- 2.6 All applicable laws and industry standards on employee wages, benefits, working hours and minimum age will be adhered to in all countries of operation. Workers will be paid at least the National Minimum Wage
- 2.7 No child labour will be used
- 2.8 No young persons under the age of 18 will be used to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development
- 2.9 No recruitment fees are charged to workers under any circumstances

3. SUPPLY CHAIN

- 3.1 As a medium sized recruitment agency, all workers who register with SourceCo Recruitment Ltd are interviewed personally by a member of our team either in person or via video interviewing and their identification and right to work in the UK documentation is inspected and scanned utilising the YOTI right to work checking systems.
- 3.2 In order to protect the integrity of our processes, we expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner and we will only use pre-approved sub-contractors who have met our strict audit checks.

4. RISK ASSESSMENT

- 4.1. SourceCo Recruitment Ltd operates as an employment business, predominantly sourcing and supplying both skilled and unskilled staff for the temporary candidate market and fast-moving consumer groups (FMCG) sectors. We are aware of the potential for being targeted by traffickers and unlicensed gangmasters. Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, in order that we may take the necessary action promptly and effectively should it be identified. We continue to monitor this aspect and update our processes accordingly.

5. DUE DILLIGENCE

- 5.1 All prospective new workers are interviewed in person or via video interview, with questions specifically targeted to try and identify whether they are subject to any form of modern slavery
- 5.3 All staff responsible for recruiting and sourcing workers are trained and required to sign up to a new set of recruiter compliance principles that govern their methods of recruiting new staff
- 5.4 SourceCo Recruitment Ltd is aiming to become an accredited business partner of Stronger Together within the next 12 months
- 5.5 Leaflets and posters on tackling hidden labour exploitation are issued to workers and displayed on client sites (where permitted)
- 5.6 Workers are provided with details of who to contact in respect of any concerns they may have in relation to modern slavery

6. TRAINING

- 6.1 Any workers supplied by SourceCo Recruitment Ltd are provided with an induction either by SourceCo Recruitment Ltd or the client which includes information on the sources of help should they, or their colleagues/friends be concerned about Modern Slavery.
- 6.2 All employees/consultants of SourceCo Recruitment Ltd will attend Modern Slavery Training to educate them about Modern Slavery and spotting the potential signs of Modern Slavery.

7. SAFEGUARDS

- 7.1 We aim to encourage openness and have set up a whistleblowing hotline for workers who can raise any concerns. Full details of the policy are contained in the worker handbook which is provided to workers.
- 7.2 We will support anyone who raises a genuine concern and ensure that they receive the appropriate support required.

- 7.3 As a GLAA licence holder, we are committed to sharing any concerns with the appropriate public bodies if we identify any issues surrounding Modern Slavery.

8. COMMUNICATION ON THIS POLICY

- 8.1 Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

9. KEY ACHIEVEMENTS

- 9.1 Highlighting our zero tolerance approach to modern slavery here are our selection of key achievements for the financial year 2023/2024
1. We transitioned from outsourcing our payroll to moving it over our own solution that is operated by GLAA accredited providers, what this means is we don't have the day to day responsibilities of running the payroll but have hand on access to things like FPS Submissions, payslips and employee portals, which is better and easier for audit purposes.
 2. We successfully passed an ethical audit with one of our clients, the basis of this audit was to ensure that we are responsible recruitment partners, we were audited on our processes and compliance.

10. TARGETS FOR 2025 & BEYOND

- 10.1 We will strive to continue working towards gold standard as a recruitment agency and aim to be a leader within the industry, we will continue to develop our current activities and keep track of progress made in previous years, in the up and coming months/years we will be looking to introduce the following: .
1. We endeavour to complete quarterly risk assessments with our clients, interviewing current workers we have out at site and ensuring that they are safe while they are at work, we will also revisit our modern slavery questionnaire with the worker to see if there have been any changes since commencement of there assignment.
 2. To achieve business partner status with stronger2gether.

11. REVIEW

- 10.1 Following its initial adoption, this Modern Slavery Policy will be reviewed by the Company Directors on a regular basis (at least annually) and may be amended from time to time.
- 10.2 Whilst we fall beneath the legal reporting threshold under the Modern Slavery Act (2015), we have voluntarily produced this statement to demonstrate our efforts in addressing modern slavery risks and to share best practice.



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Senior HR Business Partner

20/01/2025