Modern Slavery is a term used to encapsulate two offences in the Modern Slavery Act 2015:

- Slavery, servitude and forced or compulsory labour
- Human trafficking

We have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety, human rights laws and international standards are adhered to, including freedom of movement and communications. We are committed to improving our practices to combat slavery and human trafficking.

1. Our business
Millbank Holdings Limited and its subsidiaries (Millbank) is a resource management and recruitment specialist business. We provide services to clients across a number of sectors. Our subsidiaries are:

- Priory Design Services Limited
- MDA Rail Limited
- Forbes HR Limited

We have an Anti-Slavery Policy that together with our Code of Conduct and Business Ethics Policy, ensures that our staff are in adherence with the requirements of the Modern Slavery Act 2015.

2. Our supply chain
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. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains. All our suppliers as part of the procurement process confirm that they are in adherence with the Modern Slavery Act 2015.

We procure in the following areas:

- Stationery and office furniture;
- I.T. hardware, software and telecommunications;
- Vehicles;
- Personal protective equipment;
- Travel and accommodation;
- Professional Services for:
    - Building Maintenance
    - Training
    - Hygiene
    - Financial advice
    - Legal Services

3. Identification of potential risk of slavery and human trafficking in the business
A review of the risk of potential slavery and human trafficking has been undertaken and the business has identified the following areas that pose the most significant potential risk:

a. The provision of agency labour

The potential risk - enslaved or human trafficked individuals are placed in work as agency labour with clients.

Risk control – Millbank undertakes rigorous checks on each individual including; eligibility to work, reference checking, qualifications, proof of national insurance, and bank details to ensure each person is acting in their own right. Millbank informs all of their clients that they adhere to the conditions set out in the Modern Slavery Act 2015.

b. The supply chain

The potential risk **-** the use of suppliers that contravene the Modern Slavery Act 2015
Risk control - all suppliers whom set up a supplier account with us; are required to complete and return a Supplier Questionnaire Form (MF006) and as part of this they must commit to their adherence to the requirements set out in the Modern Slavery Act 2015.

4. Due diligence process for slavery and human trafficking.

As part of our initiative to identify and mitigate risk we carry out the following:

- Regular internal audits to ensure that only eligible workers are engaged for agency work;
- Review of completed Supplier Questionnaire Form (MF006) and supporting documentation by our Compliance Department;
- For the majority of our supply chain companies, our contact is a UK contact and we expect these bodies to have suitable anti-slavery and human trafficking policies and processes, where applicable. It is not practical for us to have a direct relationship and influence all levels in the supply chain.

5. How effective are we in combating slavery and human trafficking

To measure how effective our risk control measures and due diligence is to ensure that slavery and human trafficking is not taking place in our business or supply chains, we have implemented Key Performance Indicators (KPIs) to ensure:

- Our staff are fully aware of the risks under the Modern Slavery Act at induction and through regular training;
- We are 100% compliant in the internal audits of the eligibility of the right to work checks;
- Confirmation of suppliers of adherence to the Modern Slavery Act 2015.

6. Review
- Our Financial year runs from October to September, with the end of this Financial Year being 30th September 2024.
- This statement was reviewed end of October 2023 and will be reviewed annually
- Next review scheduled October 2024.

Signed by:
David Hopley
Title: Managing Director
Date: 20th October 2023