WorkFlow Services Ltd.
YOUR PROJECT DELIVERY PARTNER

Modern Slavery/Anti Human Trafficking and Illegal Workers Policy

APRIL 2022 | REV 1

Definitions

Anti-Human Trafficking and Modern Slavery are often interchangeable phrases so for the purposes of this policy the following definitions apply.

Modern Slavery is the severe exploitation of other people for commercial, or personal, gain.

Human Trafficking is the movement of people by means such as force, coercion, fraud or deception with the aim of exploiting them.

Policy Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that WorkFlow Services Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not occurring within their business or supply chain.

WorkFlow Services Ltd have a zero-tolerance approach to any form of modern slavery or human trafficking and are committed to acting ethically and with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or supply chain.

WorkFlow Services Ltd employees, contractors, subcontractors, vendors, suppliers, partners and others through whom WorkFlow Services Ltd conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- **Engaging in any form of trafficking in persons.**
- **Procuring commercial sex acts, this includes outside of work activities.**
- **Using forced labour in the performance any work.**
- **Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.**
- **Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work.**
- **Using recruiters that do not comply with labour laws of the country in which the recruiting takes place.**
- **Charging applicants/candidates recruitment fees.**

Illegal Workers

Should new members of staff be employed, WorkFlow Services Ltd will take any steps necessary to ensure that the individual has the right to work within the UK; should this be a temporary right to work, the expiry date of documents will be monitored to ensure the right to work is still valid. As part of this process WorkFlow Services Ltd will check there are no restrictions that prevent the individual from carrying out the works they are to be employed to undertake.

Suppliers

WorkFlow Services Ltd operates a Procurement Procedure and maintains an Approved Supplier List. Due diligence is conducted on all suppliers before allowing them to become an approved supplier. They must confirm that:

- **They have taken steps to eradicate modern slavery and human trafficking within their business.**
- **They hold their own suppliers to account over modern slavery and human trafficking.**
- **They have taken steps to check the rights to work in the UK of any employees.**

Performance Indicators

The effectiveness of the steps taken to ensure that slavery and/or human trafficking is not taking place within the business or supply chain will become apparent if reports are received from employees, the public, or law enforcement agencies to indicate if modern slavery/human trafficking practices have been identified.

Raising a Concern

All WorkFlow Services Ltd staff are required to use their best judgement to report any suspected modern slavery or human trafficking activity to the Company Directors or other appropriate authority. Should it become apparent that an inappropriate activity has taken place then remedial action will be carried out which may include reporting to the relevant authority and a termination of the working relationship with the perpetrator involved.

The Directors of the Company will assume responsibility for the monitoring, review and implementation of this policy.

This policy will be reviewed annually or following any significant changes.

This policy has been approved & authorised by:

Name: **Jacob Kilroy**

Position: **Contracts Director**

Date: 19 April 2022

Signature: