

ADVANCE Modern Slavery Statement and Policy 2025–2026

Introduction

This statement constitutes **ADVANCE**'s Modern Slavery Statement and Policy, issued in accordance with the Modern Slavery Act 2015. It sets out the activities and actions undertaken by **ADVANCE** during the financial year 1 April 2025 to 31 March 2026 aimed at ensuring that slavery and human trafficking do not take place within our business or across our supply chains.

This is a single statement, the principles of which are applied consistently across all companies within the **ADVANCE** Group (company number 09607008), in compliance with section 54 of the Modern Slavery Act 2015. References to "**ADVANCE**" within this statement encompass all such group companies.

Organisational Structure and Supply Chains

ADVANCE provides employment to individuals undertaking temporary and fixed-term assignments that are sourced by recruitment businesses across a wide range of sectors and industries throughout the UK. **ADVANCE** are responsible for employing and paying these individuals and are commonly referred to in the industry as an "umbrella" company.

The supply chain typically operates as follows:

- The end client instructs a recruitment business to source an individual to carry out work on a temporary or fixed-term assignment. A contract for services and associated terms and conditions of business are usually agreed between the end client and the recruitment business.
- The recruitment business identifies and assesses a suitably qualified and/or experienced individual to meet the end client's requirements. The recruitment business is responsible for determining the individual's suitability prior to introduction to the end client.
- Following introduction to the end client, the recruitment business refers the individual to **ADVANCE**, or the individual confirms to the recruitment business that they wish to be employed by **ADVANCE**.

- **ADVANCE** and the recruitment business then enter into a contract for services and agree terms and conditions of business for the supply of the individual to the recruitment business’s end client.
- **ADVANCE** subsequently employs the individual under a contract of employment, at which point the supply chain concludes.

Countries of Operation and Supply Chains

ADVANCE currently operates exclusively within the United Kingdom. Our head office is located in Ewloe, North Wales, and we employ individuals who work across the UK.

On occasion, a client may require an individual to undertake a short-term assignment overseas. In such circumstances, **ADVANCE** will carry out an appropriate review to ensure that adequate insurance and compliance measures are in place prior to any overseas work being undertaken.

Responsibility

The Managing Director, supported by the Board of Directors, holds ultimate responsibility for ensuring that this policy is aligned with **ADVANCE**’s legal and ethical obligations and that those obligations are upheld throughout the business. The Senior Leadership team has primary responsibility for the implementation, monitoring, measurement, and auditing of the effectiveness of this policy.

Management at all levels are responsible for ensuring compliance with this policy by those under their supervision. This includes providing appropriate and regular training, with support from the Senior Leadership team, to maintain awareness of modern slavery risks and reinforce **ADVANCE**’s commitment to preventing modern slavery.

ADVANCE welcomes feedback on this policy and encourages comments, suggestions, and queries on how it may be improved. These should be directed to the Managing Director via the contact page of our website at www.advance.online.



Modern Slavery Statement

Modern slavery is a crime and a serious violation of fundamental human rights. It can take many forms, including slavery, human trafficking, servitude, and forced or compulsory labour, all of which involve the deprivation of an individual’s liberty for personal or commercial gain.

ADVANCE recognises its responsibility to take a robust and proactive approach to preventing slavery and human trafficking. We operate a zero-tolerance approach to all forms of modern slavery and fully support law enforcement agencies in their efforts to eradicate such criminal activity.

Our commitment to ethical conduct and integrity underpins all of our business relationships and operations. We have established systems, processes, and controls designed to identify, assess, and reduce the risk of slavery and human trafficking occurring within our business or supply chains.

We expect the same high standards from our employees, contractors, clients, suppliers, and other business partners. Relationships are built on trust and integrity, and our selection and onboarding procedures include appropriate due diligence and compliance checks to help ensure compliance with applicable laws and ethical standards.

ADVANCE explicitly prohibits the use of forced, compulsory, or trafficked labour in any part of its operations and expects all employees, contractors, clients, suppliers, and business partners to uphold these same standards within their own organisations and supply chains.

We are committed to ensuring transparency within our business and supply chains and encourage the reporting of any concerns related to modern slavery or human trafficking. Employees and workers are expected to raise concerns without fear of retaliation, and any reports made in good faith will be taken seriously and investigated promptly.

We recognise that the risk of modern slavery is constantly evolving and are committed to continuous improvement to ensure our policies, procedures, and practices remain fully aligned with legislative requirements and industry best practice

Due Diligence Processes and Steps

Due diligence is a core practice at **ADVANCE**. We seek to identify, assess, and manage all risks of slavery and human trafficking within our business and across our supply chains, taking all necessary measures to prevent, mitigate, and address modern slavery risks.



- **ADVANCE** will not support or engage with any business knowingly involved in slavery or human trafficking.
- We only work with recruitment businesses that operate and have a presence in the UK.
- The recruitment businesses we collaborate with are reputable, many of them long-standing partners, and we expect them to adhere to anti-slavery processes and policies consistent with our own.
- We follow a strict client onboarding process and regularly monitor key business indicators, including cash flow, assets, insurance policies, web domains, year-end accounts, and Company and VAT numbers for all recruitment businesses we engage with. In 2025, we also established a partnership with Creditsafe to receive automated notifications of any changes filed at Companies House for the recruitment businesses we engage with.

Employee Onboarding and Compliance Checks

- During employee onboarding, we follow robust compliance procedures. These include collecting and verifying personal details (e.g., home address, National Insurance number, bank details, and contact information) and right-to-work documentation such as passports. These steps serve as both essential compliance measures and potential indicators of modern slavery requiring further review.
- Verifying right-to-work documentation helps to identify employees who may be at risk, such as individuals whose personal belongings or identification are being withheld or restricted. **ADVANCE** uses Identification Document Validation Technology (IDVT) requiring employees to upload a photograph for biometric facial verification. This assists in authenticating documents and detecting potentially fraudulent activity.
- As an additional safeguard, employees presenting a British or Irish birth certificate alongside their National Insurance number undergo a compliance video call to verify their identity and proactively identify possible indicators of modern slavery or forced labour.
- Employees who do not have their own bank account, or who are sharing an account, are flagged as potentially at risk. **ADVANCE**'s systems highlight instances where two or more employees share the same bank account details, and checks are conducted by the Compliance team. Any employee requesting to use a third-party bank account undergoes additional verification to ensure the arrangement is legitimate and does not indicate a risk of modern slavery.

- The Compliance team also monitor shared occupancy, recognising that multiple individuals living at the same address may be an indicator of modern slavery or human trafficking.

Payroll and Wage Checks

- In line with the Modern Slavery Act 2015, preventing an employee from receiving the National Living Wage (NLW) or National Minimum Wage (NMW) can constitute an act of modern slavery. **ADVANCE** ensures all employees are paid at least the NLW/NMW.
- Before every payroll, the Payroll team runs a report to verify compliance with National Living Wage (NLW) and National Minimum Wage (NMW) requirements. The system flags any employees potentially falling below the required wage, and employment contracts explicitly reiterate this entitlement.

Indicators of Modern Slavery

- **ADVANCE** recognises that injuries, fatigue, anxiety, agitation, poor physical health, and hygiene issues may indicate potential modern slavery and will trigger further review.
- We monitor Head Office employee absenteeism patterns, unusual reluctance to communicate independently, or consistently unexplained changes in behaviour as potential risk factors for modern slavery.

ADVANCE Modern Slavery Policy

1. Scope and Application

This policy applies to all individuals working for or on behalf of **ADVANCE**, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment and may be amended at any time.

2. Policy Commitment

ADVANCE are committed to conducting business ethically and with integrity. We maintain a zero-tolerance approach to modern slavery and human trafficking in all its forms and are

committed to implementing effective systems and controls to ensure that slavery and human trafficking do not take place within our business or supply chains.

3. Compliance with this Policy

All individuals covered by this policy must read, understand, and comply with its requirements.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of everyone working for or under the control of **ADVANCE**.

You must not engage in any activity that might lead to, or suggest, a breach of this policy. Any actual or suspected breach must be reported to your line manager as soon as possible.

Concerns regarding potential modern slavery in any part of our business or at any tier of our supply chains should be raised at the earliest opportunity. If you are uncertain whether particular treatment of employees, working conditions, or business practices may constitute modern slavery, you must escalate the matter to your manager.

Where appropriate, and with employee welfare and safety as a priority, **ADVANCE** will provide guidance and support to employees, contractors, clients, suppliers, and business partners to help address coercive, abusive, or exploitative practices within their own operations and supply chains.

We promote a culture of openness and will support anyone who raises a genuine concern in good faith under this policy, even if it is ultimately unsubstantiated.

4. Breaches of this Policy

Any employee found to be in breach of this policy may be subject to disciplinary action, potentially leading to dismissal.

ADVANCE reserves the right to terminate its relationship with any individual or organisation found to be in breach of this policy.

5. External Reporting and Support

Anyone who believes they may have encountered an instance of modern slavery, or who may be a victim themselves, can contact:

- The Modern Slavery Helpline on 0800 0121 700

- The Gangmasters and Labour Abuse Authority (GLAA) on 0800 432 0804

These services provide confidential advice and guidance.

6. Training, Communication, and Awareness

All **ADVANCE** employees are expected to comply with applicable laws, regulations, and internal policies, and to act with integrity and honesty at all times.

Training on this policy and on the risks of modern slavery and human trafficking within our business and supply chains forms part of the induction process for all Head Office employees. Ongoing training, support, and information are provided as appropriate to ensure continued awareness and understanding.

Employees are encouraged to report any circumstances that may give rise to a risk, or suspected risk, of slavery or human trafficking within our operations or supply chains.

ADVANCE are committed to protecting individuals who disclose concerns in good faith. Reports will be treated confidentially in accordance with our Whistleblowing Policy, and no individual will suffer retaliation for raising a genuine concern.

The following policies are available to all employees within the **ADVANCE** Group upon request:

- Modern Slavery Statement and Policy
- Whistleblowing Policy
- Recruitment and Selection Policy
- Anti-Harassment and Bullying Policy
- Anti-Corruption and Bribery Policy

External parties or employees wishing to raise concerns confidentially may contact the Managing Director.

Performance Indicators and Effectiveness of Our Work

During 2025, we strengthened our commitment to preventing modern slavery and human trafficking across our business and supply chains by implementing measures designed to enhance transparency, accountability, and oversight.

- We developed and launched a dedicated portal for our agency partners, providing full visibility of worker payments processed by **ADVANCE**. This enhances transparency, supports compliance with National Minimum Wage (NMW) and National Living Wage (NLW) requirements, and reinforces accurate and appropriate reporting to HMRC. The portal further strengthens accountability and enables the early identification of discrepancies or potential risk indicators.
- We established a partnership with Creditsafe to receive automated notifications of any changes filed at Companies House for the recruitment businesses we engage with. This supports proactive monitoring of structural or directorship changes and the early identification of potential risk factors.
- We introduced visual awareness materials within our Head Office, including posters displayed on staff notice boards, reminding employees of the importance of identifying and reporting modern slavery risks.

Following a review of the effectiveness of both new and existing measures implemented this year, we are committed to continuing and strengthening our approach during 2026/2027.

- We will continue to undertake regular risk assessments across the business, with particular focus on higher-risk areas such as compliance with National Living Wage (NLW) and National Minimum Wage (NMW) requirements, monitoring shared bank accounts and occupancy indicators, and maintaining robust onboarding processes.
- We will continue to raise awareness of modern slavery risks throughout the business and identify opportunities to enhance training, guidance, and access to information where appropriate.
- We remain committed to ensuring that all Head Office employees located at Ground Floor, Vista Building, Ewloe, CH5 3DT complete annual modern slavery training, with completion recorded on our centralised HR system.
- Our zero-tolerance approach to slavery and human trafficking will continue to be clearly communicated to employees, contractors, clients, suppliers, and business partners at the outset of each business relationship and reinforced as appropriate thereafter.

- We will continue to monitor relevant legislation, regulatory guidance, and best practice developments, implementing any necessary updates to our policies, procedures, and controls to strengthen protections for victims and enhance accountability within our supply chains.

ADVANCE remains committed to continuous improvement and to maintaining effective systems and controls to prevent modern slavery and human trafficking in all aspects of our operations.

Approval of this Statement

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes the **ADVANCE** Group’s slavery and human trafficking statement for the financial year ending 31 March 2026.

The statement has been reviewed and approved by the Employee Ownership Trust Board of Directors and is signed by the Managing Director, who will review and update it annually.

Statement approved by the Board of Directors: 7th April 2026

Managing Director’s Name: Shaun Critchley

Signature:



Date: 7th April 2026