

MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to **Umbrella-Company Ltd** (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2023/24.

B) ORGANISATIONAL STRUCTURE

Umbrella-Company Ltd provides umbrella and self-employed payroll services to contractors and temporary workers, working through recruitment agencies and directly to end clients, across a range of industry sectors.

Established in 2008, it currently operates with 4 Partners and 3 Directors and considers compliance, customer service and professionalism to be at the heart of everything we do.

C) OUR LOCATION

We are a UK based company located in Wilmslow, Cheshire. We have no offshore affiliations and we work with contractors, freelancers and employment/recruitment agencies throughout the UK.

D) OUR BUSINESS ETHOS

Our business is compliance led with a strong customer-centric and technology-driven approach to delivering our services. Our compliance activity is led at Director level. We operate in a highly regulated environment and absolute compliance with tax regulation, employment and contract law is at the heart of our offering.

Umbrella-Company Ltd has been a full member of the Freelancer and Contractor Services Association (FCSA), the organisation that sets the highest standard of compliance in the sector and drives the compliance agenda with HMRC, since 2018. Attaining membership of the FCSA entailed undertaking a thorough review of all processes and policies to ensure compliance with FCSA's rigorous standards. Re-accreditation occurs annually and we have passed the independent audit of our compliance with the FCSA Code of Conduct four times.

E) OUR WORKERS

As a contractor umbrella firm, a large part of our business involves the employment of freelancers undertaking agency assignment work. Workers through our umbrella service are employed under an over-arching employment contract. To ensure that modern slavery or human trafficking is not taking place within our business, prior to any new employee joining Umbrella-Company Ltd, we carry out a 'best advice' consultation to establish their circumstances, how they have come to work as a freelancer and their appetite for and attitude to contract working.

We ensure all workers are subject to full UK Eligibility to Work (ETW) checks. These have become more extensive in 2021 after the introduction of new qualification standards for EU Nationals.

F) OUR SUPPLIERS

We conduct due diligence on all suppliers before entering into any contractual arrangement.

This due diligence is focussed on satisfying ourselves that our new potential business partner shares our stringent compliance with modern slavery legislation.

G) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

H) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in UK

I) POTENTIAL EXPOSURE

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in the employment of workers from Eastern Europe where protection may be limited, and breaches of human rights more widespread.

In general, the Organisation considers its risk of exposure to slavery/human trafficking to be low. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

J) STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Key checks carried out are:

1. That the identity of every individual worker is incontrovertibly evidenced
2. That national living wage is paid for every contract worker on every assignment
3. That every individual contract worker has personal private addresses and contact details, or can satisfactorily explain why they do not
4. That every individual contract worker is paid into their own personal identifiable bank account, or can satisfactorily explain why they do not
5. That our supplier contracts include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery

The Organisation has not to its knowledge conducted any business with another organisation which has been found to have involved itself with modern slavery.

K) TRAINING

The Organisation regularly conducts training for all Umbrella-Company Ltd employees so that they understand the signs of modern slavery and where to report any concerns they may have.

L) SLAVERY COMPLIANCE OFFICER

The Organisation has a Slavery Compliance Officer, Peter Langham (Director), to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval : 1 November 2023

Signed..........

NICHOLAS HOLMES

CEO

