

Modern Slavery Statement and Policy 2023/24

Introduction

This is **ADVANCE**'s Modern Slavery Statement and Policy issued under the Modern Slavery Act 2015. It covers the activities and actions undertaken by **ADVANCE** during the financial year 6 April 2023 to 5 April 2024 aimed at ensuring that slavery and human trafficking is not taking place in any part of our own business, or in any of our supply chains.

This is a single statement with the principles outlined adhered to by all companies within the **ADVANCE** Group (company number 09607008), in compliance with section 54 of the Modern Slavery Act 2015. We refer to these companies collectively as "**ADVANCE**".

Organisational Structure and Supply Chains

ADVANCE offer employment to individuals who undertake temporary assignments which are sourced by recruitment businesses in a wide range of sectors and industries across the UK.

ADVANCE are responsible for the employment and payroll of these individuals.

The supply chain normally runs, as follows:

- The client instructs the recruitment business to source an individual to carry out works for the client on a temporary or fixed term assignment. A contract of services and terms and conditions of business are usually signed between the two businesses.
- The recruitment business source a suitably qualified and/or experienced individual to fulfil the client's temporary or fixed term vacancy. An individual's suitability for a role is determined by the recruitment business before they are introduced to the client.
- Once the individual has been introduced to the client, the recruitment business will then refer them to **ADVANCE**; or the individual will inform the recruitment business that they wish to be employed by **ADVANCE**.
- **ADVANCE** and the recruitment business will sign a contract for services and terms and conditions of business for the supply of the individual to the recruitment businesses client.
- **ADVANCE** will then employ the individual on a contract of employment. This is the end of the supply chain.

Countries of Operation and Supply Chains

ADVANCE currently operates exclusively in the UK. Our head office is based in Ewloe, North Wales; however, we have employees working throughout the UK.

Occasionally, a client may require an individual to work overseas for a short-term assignment. In this instance, we will review this to ensure that our insurance covers these scenarios.

Responsibility

The Managing Director, with support from the Board of Directors, bears ultimate responsibility for ensuring that this policy aligns with **ADVANCE**'s legal and ethical obligations, and that all under our control adhere to these. The HR Manager assumes primary responsibility for implementing, monitoring, measuring, and auditing this policy's efficacy.

Management at all levels are tasked with ensuring compliance with this policy is adhered to by all those under their supervision, providing adequate and regular training, with support from the HR Manager, to continue to raise awareness of modern slavery risks.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the HR Manager via the contact page of our website (www.advance.online).

Modern Slavery Statement

Modern slavery is a crime and a severe violation of fundamental human rights. It manifests in various forms, including slavery, human trafficking, servitude, and forced and compulsory labour; all of which involve the deprivation of an individual's liberty for personal or commercial gain.

ADVANCE recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We operate a zero-tolerance approach towards all forms of modern-day slavery, and we staunchly support law enforcement efforts aimed at eradicating this criminal activity.

Our commitment to ethical conduct and integrity underscores all our business interactions and relationships. We have implemented robust systems, processes, and controls aimed at ensuring that slavery and human trafficking finds no place within our operations and supply chains.

We hold our employees, contractors, clients, suppliers, and other business partners to the same high standards. Establishing relationships based on trust and integrity, our selection and onboarding procedures incorporate thorough due diligence and compliance checks.

In all our business dealings, we explicitly prohibit the use of forced, compulsory, or trafficked labour, and we expect our employees, contractors, clients, suppliers, and business partners to uphold the same standards within their own operations and supply chains.

Due Diligence Processes and Steps

Due diligence is an essential practice for **ADVANCE**. We seek to assess and manage all risks of slavery and human trafficking within our own business, and in that of our supply chains, taking all necessary measures to identify, prevent, and mitigate modern-day slavery risks.

- We will not support or work with any businesses knowingly involved in slavery or human trafficking.
- We only deal with recruitment businesses that operate and have a presence in the UK.

- The recruitment businesses that we work with are reputable businesses, many of whom we have long standing relationships with, and we expect them to follow the same anti-slavery processes and policies as we do.
- We follow a strict client onboarding process and consistently monitor the cash flow, assets, insurance policies, web domains, year-end accounts, and Company and VAT numbers of the recruitment businesses whom we work with.
- During the onboarding of employees, we adhere to robust compliance processes. These processes include obtaining and checking all personal details of the employee (such as home address, National Insurance number, bank details, and contact information), as well as verifying right to work documentation, such as passports. These are essential compliance processes but are also considered as potential indicators of modern slavery that may require further review.
- Verifying right to work documentation highlights any employees unwilling to provide that information. For example, an instance of an employee at risk could be if they have had their personal belongings or identification taken from them – or, if other documents are being withheld to restrict their freedom of movement.
- **ADVANCE** also use Identification Document Validation Technology (IDVT) which requires employees to upload a photograph of themselves for biometric facial checks – this technology assists in establishing the authentication of the documents presented and plays an important role in helping to identify the use of fraudulent documentation.
- An individual who does not have their own bank account or, is sharing a bank account with somebody else, is recognised as a potential victim of modern-day slavery and may need further checking. Our systems identify if two or more employees are sharing the same bank account details, and this is checked daily by **ADVANCE**'s Compliance team.
- We conduct checks on any employees requesting to use a third party's bank account details to be paid, ensuring the relationship between the employee and the third party is legitimate and does not give rise to a risk of modern-day slavery.
- **ADVANCE**'s Compliance team also carry out checks on shared occupancy, as we are aware that multiple individuals living at the same property can, in some cases, be an indicator of modern-day slavery and/or human trafficking.
- In accordance with The Modern Slavery Act 2015, preventing an employee from being paid the National Living Wage/National Minimum wage (NLW/NMW), could also be recognised as an act of modern slavery. **ADVANCE** ensure that all our employees are paid at least the NLW/NMW and, prior to processing payments, **ADVANCE**'s Payroll team run specific reports to check this.
- **ADVANCE**'s Payroll system identifies and restricts any employees who may fall below the NLW/NMW prior to completing payments and our employment contracts with the employee also iterates this point.
- Injuries, fatigue, anxiety, agitation, and/or poor physical health and hygiene are also recognised as potential indicators of modern slavery that may need further checking.

Modern Slavery Policy

This policy applies to all individuals working for or on behalf of **ADVANCE**, encompassing employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external 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.

Compliance with this Policy

You must ensure that you read, understand, and comply with this modern slavery policy.

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

You are required to avoid any activity that could lead to, or suggest, a breach of this policy. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are also encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier, at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager as soon as possible.

You should note that where appropriate, and with the welfare and safety of employees as a priority, we give support and guidance to our employees, contractors, clients, suppliers, and business partners to help them address coercive, abusive, and exploitative work practices in their own business, working environment, and supply chains.

If you are unsure about whether a particular act, the treatment of employees, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern-day slavery, raise it with your manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Breaches of this Policy

Any breach of this policy will result in disciplinary action, potentially leading to dismissal. We reserve the right to terminate relationships with individuals or organisations found to be in breach of this policy.

Modern Slavery Helpline

Anyone who thinks they may have come across an instance of modern slavery, or indeed who may be a victim themselves, can call the Modern Slavery Helpline on 0800 0121 700 or the Gangmasters and Labour Abuse Authority (GLAA) on 0800 432 0804 for more information and guidance on what to do next.

Training, Communication, and Awareness of Modern Slavery

All **ADVANCE** employees are expected to comply with all laws and act in accordance with guidelines and regulations and act with integrity and honesty.

Training on this policy, and on the risk our business faces from slavery and human trafficking in its supply chains, forms part of the induction process for all head office employees to enable

them to identify those areas which may raise concerns regarding modern-day slavery. Additional support, information, and training is provided to all head office employees accordingly.

ADVANCE encourage all employees to raise any concerns relating to any circumstances that may give rise to a risk, or a potential or suspected risk, of slavery or human trafficking in our business, or in our supply chains.

We are committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith are treated confidentially. The whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

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

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

Others who have concerns can contact the HR Manager on a confidential basis.

Performance Indicators and the Effectiveness of our Work

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our business or supply chains, **ADVANCE** intend to take the following further steps to combat slavery and human trafficking in the year 2024/2025:

- Continue to risk assess the business and focus on areas most at risk of being used for modern slavery, particularly around National Living Wage/National Minimum Wage, shared bank accounts and/or occupancy, and our onboarding processes.
- Continue to raise awareness of modern slavery risks and consider any areas where additional training and information can be organised and provided.
- Maintain our zero-tolerance approach to slavery and human trafficking and ensure that this is communicated to all employees, contractors, clients, suppliers, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- Monitor all modern slavery laws, guidelines, and legislation and work towards any amendments or changes in compliance, where required, to further strengthen the protection for victims of slavery and/or human trafficking and increase the accountability of companies in eradicating modern slavery from supply chains.

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 2024. The statement was signed and approved by the Managing Director, who will review and update it annually.

Managing Director's Name: Anna Dodd (Sills)

Signature:

A handwritten signature in black ink that reads "Anna Dodd (Sills)". The signature is written in a cursive style with a horizontal line underneath the name.

Date: 02/04/2024