

Modern Slavery Statement

Company Policy No: 36 Company: Coyle Personnel Ltd

Issue No: 8

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Modern Slavery Statement

INTRODUCTION

Modern Slavery is a crime and gross violation of fundamental human rights. Coyle Personnel Ltd has a responsibility to be alert of the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

This statement sets out Coyle Personnel Ltd's actions to understand all modern slavery risks related to business and to ensure steps are maintained to prevent slavery and human trafficking. This statement is made pursuant to section 51(1) of the Modern Slavery Act 2015 and constitutes our company's slavery statement for the financial year ending 30 September 2022.

OUR BUSINESS

Coyle Personnel Ltd is a privately-owned recruitment agency with over 150 employees across the UK and has a national annual turnover of £98.9 million (Sept 2021) and over 1500 staff deployed on assignments across the UK weekly. Coyle Personnel Ltd offers construction, rail, medical and public sector resourcing solutions to a variety of private and public funded organisations. We principally operate in the United Kingdom and have 11 offices based in Harrow, City of London, Chelmsford, Reading, Ashford, Cardiff, Walsall, York, Glasgow, Manchester and Milton Keynes.

NATURE OF OUR SUPPLY CHAIN

Coyle Personnel Ltd's supply chains include the sourcing of office equipment and suppliers principally related to the provisions of recruitment services.

The relationship with all our suppliers has been established over a number of years and is built upon mutually beneficial factors, where we have close and personal links and contact with the owners or directors, typically reflecting the fact that we partner with small and medium sized operations in the main.

As and when we have new contractors or supplies come on-board we pre-qualify any new firm through a series of diligence, relating to company performance, HS&E compliance and references from other customers to establish they are suitable.

POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

Our modern slavery policy reflects our commitment to acting ethically and with integrity in all our business activities and relationships and implementing and enforcing effective procedures and controls to minimise the risks of modern slavery practices infiltrating our business operations or supply chains. We also make sure our suppliers are aware of our policies and ask that they adhere to the same high standards.

RISK ASSESSMENT

We use the Risk Management processes to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking, in particular, geography, sector and cost of supply.

DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY

In order to monitor and mitigate the risks of slavery occurring within our supply chains we aim to follow the due diligence processes in relation to new suppliers identified as being high risk according to the risk assessment procedures described above. Also, as part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect their entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt "one-up" due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- Where non UK based companies form part of our supply chain we will seek the same assurances that they comply with the letter and ethos of the Modern Slavery Act.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

The Directors are responsible for compliance in their respective Business Units and for their supplier relationships.

STAFF TRAINING

We will provide training to relevant members of staff at Induction to ensure that they understand the risks of modern slavery infiltrating our business or supply chains and effective operation of our policies and procedures are aimed at mitigating this risk.

All Directors have been briefed on the subject.

We make specific provision in our Whistleblowing Policy or the protection of those who whistleblow in relation to any issue of modern slavery.

Completion of audits as part of the Quality process.

Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

Chris Coyle Director