



Modern Slavery Statement

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Introduction

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015 and covers the activities of Syft Online Limited T/A Indeed Flex. It details the action taken by us to prevent and combat modern slavery and human trafficking within our business and supply chain

Indeed Flex has a zero-tolerance approach to modern slavery and we are committed to ensuring that our employees and any agency workers that we supply (directly or indirectly) are not subjected to behaviour or threats that may amount to modern slavery, human trafficking, forced labour and similar human rights abuses.

Our Business

Indeed Flex is a web and mobile-based application that provides recruitment services for temporary workers across the hospitality, retail, industrial, and facilities management sectors. We are part of the wider Indeed group but operate with our own internal employees, policies and governance separate from our parent company. For details of our group structure, see www.indeedflex.co.uk/about-us.

We operate across the whole of the UK and in the USA. Candidates for UK roles are only sourced from within the UK, helping us to ensure compliance with local employment laws and safeguard against risks of exploitation. We also recognise that temporary and agency labour is considered a high-risk sector for modern slavery. With this in mind, we have put in place stringent recruitment, auditing and management processes including right-to-work checks, document verification and ongoing compliance monitoring through our platform to minimise this risk.

Indeed Flex is an equal opportunities employer committed to creating and maintaining a non-discriminatory and respectful working environment for both our employees and agency workers.



Our recruitment and people management practices are designed to ensure all individuals are legally entitled to work in the UK and are protected from any form of abuse or coercion. We also ensure that our services are provided to workers completely free of charge, with no fees or costs. Our recruitment and onboarding processes are designed to prevent debt bondage and to ensure that workers always retain full control of their personal documents.

We will not enter into business with any organisation that knowingly supports or is involved in slavery, servitude, forced or compulsory labour.

If an existing partner organisation were found to be involved in modern slavery, we would take immediate steps to investigate and review the situation. Our approach would be to engage with them directly, set out clear expectations for corrective action and agree on a strategy to remediate the issue. Where improvements are not made, or where there is evidence of ongoing exploitation, we would terminate the relationship. This approach helps us to both safeguard workers and encourage organisations to make lasting improvements.

Other Relationships

As part of our business, we also work with and hold memberships with the following organisations:

- Recruitment and Employment Confederation (www.rec.uk.com)
- Association of Labour Providers (www.labourproviders.org.uk)
- Unseen (www.unseenuk.org)
- Gangmasters and Labour Abuse Authority (www.gla.gov.uk)
- Stronger Together (www.stronger2gether.org)
- Alcumus – SafeContractor (<https://www.safecontractor.com/en-gb/>)

These memberships actively support our modern slavery strategy. For example, Unseen provides ongoing guidance on building and strengthening our modern slavery policies and supports us with resources such as the [Modern Slavery Helpline](#) which we advertise on our Flex app. We also access training through Unseen and Stronger Together, which helps to raise awareness across our teams and ensures our staff are equipped to spot the signs of exploitation.

Our membership with the Association of Labour Providers (ALP) and the REC (Recruitment and Employment Confederation) gives us access to industry best practice, policy updates and forums where we can contribute to improving wider sector standards. We are GLAA licensed, and through them we stay aligned with regulatory expectations and enforcement priorities, which strengthens our compliance processes. Finally, SafeContractor certification helps us benchmark our business against strict compliance and ethical standards, giving added assurance to our clients and workers.



Together, these partnerships not only demonstrate our commitment to tackling modern slavery but also provide us with practical tools and training to continually improve the effectiveness of our approach.

Our Supply Chains and Partner Due Diligence

Indeed Flex's supply chain is broadly categorised into two areas: the Labour Supply Chain (our Flexers and clients) and the Corporate Vendor Supply Chain (providers of goods and services to our business).

Labour Supply Chain and Client Engagement

We supply temporary staff, located exclusively in the UK, to clients across sectors including hospitality, retail, industrial and facilities management. While our UK-only sourcing strategy helps mitigate risk, we acknowledge the importance of reporting on sectoral risk, especially in these high-volume industries. We also recognise the heightened risk that may occur if workers are not directly accessing Indeed Flex, such as when other partner organisations feed workers into our system.

To ensure ethical standards are upheld throughout this chain:

- **Partner Expectations:** All clients are issued with a copy of our Modern Slavery Statement and Code of Conduct at the beginning of our business relationship and this is reinforced at least annually thereafter. We expect the same rigorous commitment to high standards from all clients and business partners.
- **Agency Partner Due Diligence:** We maintain a strong network of UK-based agency partners. These strategic partners are carefully audited by our Agency Partner Compliance Team every 6 to 12 months. This compliance review specifically scrutinises their modern slavery processes and policies to ensure their workers are properly safeguarded.

Corporate Vendor Supply Chain

Our corporate vendors provide essential services, such as IT and some are located outside the UK. We acknowledge that our overall supply chain will therefore be international.

We subject all vendors to a robust procurement process that includes a review of security, privacy and ethical practices, including their commitments regarding modern slavery, human trafficking and whistle-blowing. We work exclusively with reputable companies that have established policies and procedures to tackle these risks and, as a policy, we do not have contracts with companies in



high-risk countries. Our vendor assessment explicitly considers modern slavery and human trafficking risks to ensure our core suppliers align with our ethical standards.

Our Policies

Our commitment to ensuring that Modern Slavery is eradicated and exposed is supported by a suite of policies and processes that are reviewed annually and updated to reflect best practices and evolving legal requirements.

Our policy framework includes, but is not limited to, the following key documents:

- **Modern Slavery Policy:** This policy explicitly outlines our zero-tolerance approach to modern slavery in all its forms, including forced labour, human trafficking and child labour. It details our responsibilities, due diligence processes and reporting mechanisms to prevent and address modern slavery risks within our business and across our supply chains.
- **Human Rights Policy:** This policy upholds our commitment to human rights, per international conventions like the Universal Declaration of Human Rights and UN Guiding Principles. It covers fair labour, safe work and non-discrimination.
- **Whistleblowing Policy:** This policy provides a secure and confidential channel for all employees, workers and external stakeholders to report any concerns, including those related to modern slavery, human rights violations or other unethical conduct, without fear of retaliation. It outlines clear procedures for reporting, investigation and appropriate action.
- **Anti-Bribery & Corruption Policy:** This policy sets out our strict stance against all forms of bribery and corruption, which can sometimes be linked to modern slavery and other illicit activities. It provides guidance on identifying and preventing corrupt practices and ensures compliance with relevant anti-bribery and corruption laws.
- **Anti-Bullying & Harassment Policy:** This policy underscores our commitment to fostering a workplace free from bullying and harassment. It defines unacceptable behaviours, outlines reporting procedures, and ensures that all individuals are treated with dignity and respect.
- **Equality, Diversity and Inclusion Policy:** This policy promotes a diverse, equitable and inclusive working environment where all individuals are valued and have equal opportunities. It actively works to prevent discrimination on any grounds, contributing to a workplace culture that is less susceptible to exploitation.
- **Code of Conduct Policy:** This overarching policy sets out the expected ethical standards and professional behaviours for all individuals working with or for Indeed Flex. It serves as a guiding document for decision-making and reinforces our commitment to integrity, transparency, and social responsibility across all aspects of our operations.



These policies are integral to our corporate governance and are communicated to all employees, workers and relevant business partners. We believe that by embedding these principles into our operations, we can proactively mitigate risks and promote ethical practice.

Our policies and procedures have also been developed in alignment with the following five UN Sustainable Development Goals:

- No poverty
- Good health and wellbeing
- Quality education
- Good jobs and economic growth
- Reduced inequality

These policies and processes are informed by internationally recognised standards and declarations;

- The Base Code of the Ethical Trading Initiative (ETI)
- The International Labour Organisation (ILO)
- The UN Guiding Principles on Business and Human Rights
- The UN Universal Declaration of Human Rights
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work

Indeed Flex's policies are established by HR and the Risk & Compliance Team, based on advice from professionals, industry best practice and legal advice. We review our policies annually, or as needed to adapt to changes.

Our employees and workers are encouraged to report concerns by contacting us via the appropriate channels documented in our Modern Slavery Policy. All reports will be investigated based on the processes outlined in our Modern Slavery Policy and Escalation Process and if applicable the relevant authorities will be contacted. Any individuals that report concerns whether openly or confidentially, are taken seriously and receive full protection under our Whistleblowing Policy.

Alternatively, for more information or guidance, or to report a case of modern slavery, we advise that clients, agency workers and internal employees can contact [Unseen](#), an independent organisation, via their Modern Slavery Helpline on **08000 121 700** should they wish.

Due Diligence Processes, Risk Assessment and Continuous Improvement



Indeed Flex maintains a proactive and systemic approach to tackling modern slavery, focused on protecting Flexers and ensuring compliance across the supply chain.

Risk Assessment Conclusion and Findings

Following consideration and continuous monitoring, we have not identified any confirmed instances or significant residual risks of modern slavery, forced labour or human trafficking within our direct employment operations. This outcome reflects our ongoing use of technology-driven due diligence and our commitment to spotting and addressing potential risks. However, we will always remain vigilant, especially given the higher-risk nature of the sectors we operate in.

Mitigation Through Technology and People

To actively counter these risks, we have strengthened our programmes in three core areas since 2023:

1. **Technology-Led Risk Control:** We leverage our platform as our first line of defence against exploitation. Our safeguarding systems are implemented to automatically flag duplicate worker information across critical fields such as bank details, National Insurance numbers, addresses, Next of Kin details and contact numbers. This data-led approach is crucial for identifying exploitative networks that attempt to use our platform as a vehicle for trafficking. Furthermore, we strictly prohibit Flexers from using bank accounts that are not in their own name (unless necessary legal relationship proof is established), which is a key control against financial coercion.
2. **Worker Safeguarding and Empowerment:** We utilise our annual membership with the anti-slavery charity [Unseen](#) to empower our workers. The confidential Modern Slavery and Exploitation Helpline is actively advertised on the Indeed Flex app and permanently accessible on the worker's 'Pay' tab, providing a secure, independent channel for reporting concerns.
3. **Internal Governance and Expertise:** Modern slavery training is mandatory and provided annually to all internal employees, with detailed specialised training from Unseen given to our front-line Recruitment and Operations teams. We have embedded this expertise through a network of 14 dedicated UK Anti-Slavery Champions and a formal, documented Escalation Process managed by the Risk and Compliance team to ensure all concerns are immediately prioritised. Finally, we have a Modern Slavery Policy with detailed guidance for employees and agency workers, which is consistently available via our Employee Handbook and Agency Worker Guidebook.

Ongoing Commitment and Performance Indicators (KPIs)

To demonstrate the effectiveness of our due diligence and the functionality of our internal reporting mechanisms, we will continue to monitor the following specific Key Performance Indicators (KPIs) throughout the Financial Year 2025-2026:

Key Performance Indicators (KPIs)	Measurement Focus
Total Whistleblowing Reports	The overall number of reports received through our whistleblowing channels.
Modern Slavery and Labour Abuse Reports	The number of specific reports related to modern slavery or labour abuse.
Staff Training Completion Rate	Percentage of internal staff completing mandatory annual training.

We are committed to reviewing and improving our practices each year to prevent modern slavery within our business and supply chains. Our future initiatives will continue to build on our work in line with the Modern Slavery Act 2015, the UN Guiding Principles on Business and Human Rights (UNGPs), and the updated Transparency in Supply Chains (TISC) guidance.

We will continue to take the following steps to minimise the possibility of any problems:

- Require the businesses we work with to abide by our Code of Conduct.
- Collaborate with our stakeholders in order to improve standards and transparency across our supply chain.
- Ensure that all internal employees involved in the procurement process are aware of and follow the modern slavery procurement guidance on GOV.UK.
- Continue to take action to embed a zero tolerance policy towards modern slavery.

Signatories

This statement was approved by the CEO and the board of Indeed Flex on 6th October 2025 and is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 5th April 2025.

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CEO, Indeed Flex

