



Modern Slavery Statement 2026

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 ("Indeed Flex"). It sets out the steps taken by Indeed Flex during the financial year to prevent and combat modern slavery and human trafficking within our business and supply chains.

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

We recognise that modern slavery is a complex and evolving issue and that the temporary and agency labour sector presents particular risks of labour exploitation. Our approach therefore focuses on prevention, effective due diligence, worker safeguarding, early identification of concerns, appropriate investigation and remediation, and continuous improvement.

We recognise that no organisation can completely eliminate modern slavery risk. We therefore continually assess our controls, monitor emerging risks and use findings, investigations, audits and lessons learned to strengthen our approach.

Our Business

Indeed Flex is a web and mobile-based application that provides recruitment services for temporary workers across sectors including hospitality, retail, industrial, warehousing, logistics and facilities management.

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, please refer to the Indeed Flex website.

We operate across the whole of the UK and in the USA. Candidates for UK roles are sourced from within the UK, helping us to ensure compliance with local employment laws and reduce risks associated with cross-border recruitment and exploitation.



We recognise that temporary and agency labour is considered a higher-risk sector for modern slavery. With this in mind, we have established recruitment, auditing and management processes including right-to-work checks, identity and document verification, ongoing compliance monitoring and safeguarding controls.

Indeed Flex is 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 individuals are legally entitled to work in the UK and are protected from abuse, coercion and exploitation.

Our services are provided to workers free of charge, with no fees or costs charged to access work through Indeed Flex. Our recruitment and onboarding processes are also designed to prevent debt bondage and ensure workers retain control of their personal documents.

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

Where an existing partner organisation is found to have potential involvement in modern slavery or labour exploitation, we will investigate and assess the circumstances. Where appropriate, we will engage with the organisation, establish clear expectations for corrective action and agree appropriate remediation. Where improvements are not made, or where there is evidence of ongoing or serious exploitation, we may terminate the relationship.

Other Relationships and Industry Engagement

As part of our business, we work with and maintain memberships or relationships with relevant organisations, including:

- Recruitment and Employment Confederation (REC)
- Association of Labour Providers (ALP)
- Unseen
- Gangmasters and Labour Abuse Authority (GLAA)
- Stronger Together
- Alcumus SafeContractor
- Sedex



These relationships support our modern slavery strategy by providing access to industry knowledge, guidance, training, regulatory information and recognised good practice.

Unseen provides specialist guidance and resources relating to modern slavery and exploitation. We also promote the independent Modern Slavery & Exploitation Helpline to workers and other stakeholders and access relevant training and resources.

Our membership of the Association of Labour Providers and the Recruitment and Employment Confederation provides access to industry best practice, policy updates and developments affecting the temporary labour sector.

Indeed Flex is GLAA licensed and uses relevant regulatory guidance and expectations to support our compliance approach.

Engagement with Stronger Together and other specialist organisations helps us maintain awareness of emerging risks and recognised approaches to preventing labour exploitation.

Indeed Flex also engages with Sedex (Supplier Ethical Data Exchange) as part of our wider approach to responsible sourcing, supply chain transparency and ethical due diligence. As part of this engagement, we have undergone an independent SMETA 4-Pillar audit, covering Labour Standards, Health & Safety, Environment and Business Ethics. The audit included a review of relevant policies, processes and records, alongside confidential employee interviews. This work supports our ongoing commitment to identifying, assessing and managing ethical and labour-related risks across our business and supply chain, while providing greater transparency to our clients and business partners.

SafeContractor certification also supports our wider approach to responsible business practices and compliance.

We use these relationships to inform our policies, risk assessments, training, due diligence and continuous improvement activity.

Our Supply Chains and Partner Due Diligence

Indeed Flex's supply chain is broadly categorised into two areas:

- Labour Supply Chain – our Flexers, clients and agency partners involved in the provision of temporary workers.

- Corporate Vendor Supply Chain – providers of goods and services to our business.

We recognise that modern slavery risks may exist within our direct operations and further along our supply chains. We therefore apply a risk-based approach to due diligence and oversight.

Labour Supply Chain and Client Engagement

We supply temporary workers, located exclusively in the UK, to clients across sectors including hospitality, retail, industrial and facilities management.

While our UK-only sourcing strategy helps mitigate certain risks, we recognise the heightened risk of exploitation associated with high-volume temporary labour environments. We also recognise that additional risks may arise where workers are supplied through partner organisations.

To support ethical standards throughout this chain:

- **Partner Expectations:** Clients are provided with our Modern Slavery Statement and Code of Conduct at the beginning of the business relationship, with expectations reinforced through ongoing engagement.
- **Agency Partner Due Diligence:** We maintain a network of UK-based agency partners which are subject to compliance due diligence and regular audits by our Agency Partner Compliance Team, generally every 6 to 12 months.
- **Compliance Reviews:** Agency partner reviews consider relevant policies, procedures and controls relating to modern slavery, worker safeguarding and ethical labour practices.
- **Ongoing Monitoring:** We monitor relevant worker and partner activity for indicators that may require further investigation or escalation.
- **Escalation:** Concerns relating to modern slavery, labour exploitation or worker welfare are escalated through our internal compliance processes.

Where concerns are identified within a partner organisation, we seek to understand the circumstances and establish appropriate corrective and preventative actions. Where necessary, we will review the continuation of the business relationship.

Corporate Vendor Supply Chain



Our corporate vendors provide essential goods and services, including technology and professional services. Some elements of our corporate supply chain may be located outside the UK.

We subject vendors to an appropriate procurement and due diligence process which considers areas including security, privacy and ethical practices, including their approach to modern slavery, human trafficking and whistleblowing.

We assess relevant supply-chain risks when establishing business relationships and expect suppliers to operate responsibly and in accordance with applicable laws and ethical standards.

Our Policies and Governance

Our commitment to preventing modern slavery is supported by a suite of policies and processes which are reviewed regularly and updated to reflect best practice, identified risks and evolving legal requirements.

Our policy framework includes, but is not limited to:

- **Modern Slavery Policy** – sets out our zero-tolerance approach to modern slavery, forced labour, human trafficking and other forms of exploitation, together with responsibilities, due diligence and reporting requirements.
- **Human Rights Policy** – supports our commitment to internationally recognised human rights principles and fair and safe working practices.
- **Whistleblowing Policy** – provides channels for employees, workers and relevant external stakeholders to raise concerns confidentially and without fear of retaliation.
- **Anti-Bribery & Corruption Policy** – establishes controls against bribery and corruption and supports ethical business practices.
- **Anti-Bullying & Harassment Policy** – supports a workplace in which individuals are treated with dignity and respect.
- **Equality, Diversity and Inclusion Policy** – supports an inclusive working environment and seeks to prevent discrimination.
- **Code of Conduct** – sets out expected ethical and professional standards for individuals working with or for Indeed Flex.

These policies are integral to our governance framework and are communicated to relevant employees, workers and business partners.

Our policies and processes are informed by internationally recognised standards and principles, including:

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

Our policies are established and maintained by relevant business functions, including HR and Risk & Compliance, with input from professional advice, industry best practice and legal guidance where appropriate.

During the reporting period, we continued to strengthen our internal governance through our Anti-Slavery Champions network and Modern Slavery Working Group. These structures support cross-functional collaboration, increase awareness of exploitation risks and help ensure concerns can be identified, raised and appropriately addressed.

Due Diligence, Risk Assessment and Continuous Improvement

Indeed Flex maintains a proactive and risk-based approach to identifying, assessing and managing modern slavery risks within our business and supply chains.

Our risk assessment considers factors including:

- The sectors in which we operate.
- The temporary and agency nature of the labour we provide.
- Potential worker vulnerabilities.
- The activities and controls of agency partners and other suppliers.
- Supply-chain and geographic considerations.
- Emerging modern slavery and labour exploitation risks.
- Information identified through audits, investigations, compliance activity and worker concerns.

We recognise that temporary labour environments may create vulnerabilities where workers experience financial pressure, language barriers, dependency on others,

unfamiliarity with employment rights or other circumstances which could increase susceptibility to exploitation.

During the reporting period, we continued to strengthen our approach through:

- Ongoing agency partner due diligence and compliance reviews.
- Regular agency partner audits.
- Corporate vendor due diligence.
- Continued monitoring of worker information and activity.
- Review of emerging risks and lessons learned from compliance and safeguarding activity.
- Development and progression of our Ethical Labour audit approach.
- Continued development of our formal Modern Slavery escalation and remediation process.
- Continued development of our Anti-Slavery Champions network and Modern Slavery Working Group.
- Review and development of our Modern Slavery Policy.
- Continued engagement with specialist organisations and industry bodies.

Technology-Led Risk Controls

Technology forms an important part of our preventative approach.

Our safeguarding systems can identify potential duplication or links between worker accounts across information such as:

- Bank details.
- National Insurance numbers.
- Addresses.
- Next-of-kin details.
- Contact numbers.
- Other relevant worker information.

This monitoring can help identify activity requiring further investigation, including potential account misuse, identity concerns or activity which may indicate exploitation.

We also require workers to use bank accounts in their own name unless appropriate evidence of a legitimate legal relationship or arrangement is provided.



These controls support our efforts to identify potential indicators of exploitation, including activity involving multiple workers or accounts.

However, we recognise that technology alone cannot identify every form of modern slavery or exploitation. Human judgement, worker engagement and appropriate escalation remain fundamental to our approach.

Worker Identity, Substitution and Safeguarding

Maintaining confidence that the individual accepting and undertaking a booking is the same person is an important part of our safeguarding and compliance framework.

Unauthorised worker substitution or impersonation can undermine identity, right-to-work and safeguarding controls and may increase the risk of exploitation.

During the reporting period, we therefore strengthened our preventative approach to worker substitution and impersonation.

We provide recurring communications to Flexers reinforcing the requirement that bookings must only be worked by the individual who accepted the booking.

Flexers are reminded that where they are unable to attend a booking, they should contact Indeed Flex through the appropriate channels rather than arranging for another individual to work on their behalf.

We are also implementing communications for clients reinforcing the importance of worker identity verification and reporting suspected worker substitution or impersonation.

These measures form part of our wider preventative control framework and help reduce the risk of identity, right-to-work and safeguarding controls being circumvented.

Worker Voice and Reporting

Workers and other stakeholders are encouraged to raise concerns without fear of retaliation.

Employees and workers can raise concerns through the appropriate Indeed Flex reporting channels, including the internal escalation and whistleblowing processes set out within our relevant policies.



All reports are taken seriously and assessed in accordance with our established processes. Where appropriate, matters are investigated and referred to relevant internal teams or external authorities.

We also promote the independent Modern Slavery & Exploitation Helpline, operated by Unseen, as an additional confidential route for workers and other stakeholders to seek advice or report concerns.

The helpline can be contacted on 08000 121 700.

The helpline is also promoted through our worker-facing channels, providing an independent route for individuals who may prefer to seek support outside Indeed Flex.

We recognise that effective worker voice is an important safeguard against exploitation and therefore continue to promote awareness of available reporting routes.

Safeguarding, Investigation and Remediation

Indeed Flex is committed to a person-centred approach where concerns relating to modern slavery or labour exploitation are identified.

During the reporting period, we continued to develop and strengthen our formal Modern Slavery escalation and remediation process.

Where a potential concern is identified, our approach considers:

- Immediate safeguarding and welfare considerations.
- The circumstances and needs of the individual.
- The nature and severity of the concern.
- Indicators of coercion, control, trafficking, forced labour or other abuse.
- Whether further internal investigation is required.
- Whether specialist external support or referral is appropriate.
- Whether relevant authorities should be contacted.
- Whether action is required in relation to a client, agency partner or other organisation within our supply chain.
- Appropriate corrective and preventative actions.

We seek to ensure that responses are proportionate, documented and focused on protecting workers.



Where concerns are identified, we also consider the underlying cause and whether additional controls, training, communications or due diligence are required to reduce the likelihood of recurrence.

Our approach therefore seeks not only to respond to individual concerns, but also to use learning from those concerns to improve our wider preventative framework.

Training and Awareness

Training and awareness are central to our approach to modern slavery prevention.

All Indeed Flex employees complete mandatory modern slavery training.

During the reporting period, 100% of Indeed Flex employees completed mandatory modern slavery training, supporting organisation-wide awareness of modern slavery risks, indicators of exploitation and appropriate reporting and escalation routes.

We also provide additional specialist awareness and training activity where appropriate, including access to resources and training from organisations such as Unseen and Stronger Together.

Our Anti-Slavery Champions network supports the embedding of awareness across the organisation and helps ensure that modern slavery remains an ongoing business priority.

We continue to review our training and communications to ensure they remain relevant to the risks faced by our business, our workers and our supply chains.

Monitoring and Measuring Effectiveness

We recognise that effective modern slavery governance requires more than having policies and procedures in place. We therefore monitor relevant activity, emerging themes and control effectiveness to identify areas where further action may be required.



Our monitoring includes:

- Modern slavery and labour exploitation concerns raised.
- Whistleblowing reports.
- Investigations and escalations completed.
- Modern slavery training completion.
- Agency partner due diligence and audit activity.
- Ethical labour and compliance reviews.
- Emerging risk themes and trends.
- Corrective and preventative actions.
- Worker substitution and impersonation concerns identified and managed.
- Lessons learned from individual cases and investigations.

During the reporting period, 100% of Indeed Flex employees completed mandatory modern slavery training.

We also use findings from audits, investigations, risk assessments and compliance activity to consider whether our controls remain appropriate and whether additional preventative measures are required.

Our approach to monitoring is therefore focused not only on measuring activity, but on understanding whether our controls are effective and using the findings to inform continuous improvement.

Performance Indicators

We monitor a range of indicators to support our assessment of modern slavery risk and the effectiveness of our controls.

These include:

Key Performance Indicator	Measurement Focus
Whistleblowing Reports	Number and nature of reports received through whistleblowing channels.
Modern Slavery and Labour Abuse Reports	Number and nature of concerns specifically relating to modern slavery, labour exploitation or abuse.
Staff Training Completion	Percentage of internal employees completing mandatory modern slavery training.
Agency Partner Compliance Activity	Completion of relevant due diligence, compliance reviews and audits.
Modern Slavery / Ethical Labour Audits	Findings, actions and themes identified through relevant audit activity.
Safeguarding and Investigation Activity	Concerns escalated, investigated and appropriately resolved or referred.
Emerging Risk Themes	Trends and indicators identified through investigations, audits, worker engagement and compliance monitoring.

For the reporting period, 100% of Indeed Flex employees completed mandatory modern slavery training.

We will continue to use these indicators alongside qualitative information, including audit findings, worker feedback, investigations and lessons learned, to assess the effectiveness of our controls.

Progress During the Reporting Period

During the reporting period, Indeed Flex continued to strengthen its modern slavery prevention framework.

Key areas of progress included:

- Continued development and review of our Modern Slavery Policy.

- Continued development of our formal Modern Slavery escalation and remediation process.
- Strengthening of our Anti-Slavery Champions network.
- Continued operation of our Modern Slavery Working Group and cross-functional approach.
- 100% completion of mandatory modern slavery training by Indeed Flex employees.
- Ongoing agency partner due diligence and compliance reviews.
- Continued agency partner audit activity.
- Development and progression of our Ethical Labour audit approach.
- Continued engagement with specialist organisations and industry bodies.
- Continued monitoring of worker information and activity for potential indicators of exploitation.
- Introduction of recurring Flexer communications reinforcing that bookings must only be worked by the individual who accepted them.
- Development of client communications reinforcing the importance of worker identity verification and reporting suspected worker substitution or impersonation.
- Continued review of emerging risks, compliance findings, investigations and lessons learned.

These actions demonstrate our continued focus on strengthening the practical controls used to prevent, identify and respond to modern slavery and labour exploitation risks.

Our Commitment for the Year Ahead

Our commitment to preventing modern slavery remains ongoing.

During the next reporting period, we will continue to focus on:

- Further embedding our Modern Slavery Policy and associated procedures.
- Continuing to develop our Anti-Slavery Champions network and Modern Slavery Working Group.
- Maintaining and strengthening organisation-wide modern slavery awareness and training.
- Continuing risk-based due diligence of agency partners and other relevant supply-chain organisations.
- Continuing agency partner compliance reviews and audits.
- Developing and undertaking Ethical Labour and modern slavery-related audit activity.

- Continuing to strengthen our escalation, investigation and remediation processes.
- Maintaining preventative communications to Flexers and clients regarding worker identity, unauthorised substitution and reporting concerns.
- Monitoring emerging modern slavery and labour exploitation risks across the temporary labour sector.
- Reviewing our controls and processes in response to identified risks, incidents, audit findings and lessons learned.
- Continuing to engage with specialist organisations and industry bodies to maintain awareness of recognised good practice.
- Continuing to assess the effectiveness of our controls and use findings and lessons learned to inform further improvements.

We recognise that modern slavery is a complex and evolving issue and that responsible businesses must continually challenge and improve their approach.

Indeed Flex is committed to maintaining strong safeguards for workers, promoting ethical labour practices throughout our supply chain and taking appropriate action wherever concerns are identified.

Signatories

This statement has been approved by the CEO and Board of Indeed Flex and is made pursuant to Section 54(1) of the Modern Slavery Act 2015 for the financial year ending 5 April 2026.

Oghenovo Constore
CEO, Indeed Flex

A handwritten signature in black ink, appearing to read "Oghenovo Constore".