

Purpose and Scope

This policy outlines our Responsible Recruitment Standards in line with our Responsible Recruitment Strategy of which the Responsible Recruitment Toolkit has formed its foundation. This applies not only to the Company, but anyone that the company has business dealings with.

Standards

The company has a minimum set of standards within which it will and any 2nd Tier work to. These are set out below:

1. Every worker should have freedom of association
2. Every worker should have the legal right to work in the UK
3. Every worker must be of sufficient age to ensure child-labour is not adopted within our company or supply.
4. No worker should pay for a job
5. No worker should be indebted or coerced to work
6. No worker should be involved in bonded-labour
7. No worker should have their ID documents retained by anyone else
8. No worker should be subject to threat or violence to work

Freedom of Association

The Company acknowledges and seeks to action the Community Charter of the Fundamental Social Rights of Workers 1989, as such it has set out a policy relating to the Freedom of Association:

HR17 Freedom of Association Policy 290917

Within the policy, it details the rights of all workers with the company having a firm commitment to creating strong business growth which is achieved not at the expense of the Environment, Quality of Life or Social Equity. As such, it ensures workers are entitled to the following:

- a. Facilitate freedom of association and collective bargaining
- b. Allow and provide for worker representation
- c. Ensures that freedom of association and collective bargaining takes place without discrimination or victimisation

Legal Right To work in the UK

The company operates a strict compliance procedure in line with its HR 33 Compliance Policy, which identifies threats to the business as a result of non-compliance.

As a minimum every staff member will adhere to the following to ensure the Company meets its statutory obligations when on-boarding workers:

- a. View in person document ID or Virtual in line with Government advice - where Virtual is conducted, the actual documents must be presented on the first day of assignment.

- b. Complete full registration documents on Boxed, prior to being placed available to work
- c. Where applicable, obtain the necessary references
- d. Where applicable, obtain the necessary proof of qualifications and checks

It is the duty of each employee to ensure within their band of responsibility, that no person is put out to work until they have satisfied the Compliance requirements of that role as laid down in the Compliance framework. Employees are to report any situation which may pose a serious or imminent threat to the company, Clients or the individual relating to Compliance.

Child Labour

Through the process of compliance and training, the company ensures at all time that child labour is not used throughout the company and its partners through age verification and auditing.

If the company identified any company it works with that supports or uses child labour, it would dispense of their services with immediate effect and report them to the appropriate authorities.

Paying for Work

The company is vehemently against any one or company that seeks to exploit workers in having to pay money in order to secure a job. Through our compliance process and various policies/procedures, the company ensures that any worker wishing to join us, has done so freely and without having to pay any money in order to gain work.

Weekly auditing checks are undertaken to ensure Modern Day Slavery is not operating within our business and those that we work with in accordance with our HR 38 anti-slavery policy.

Coerced to work

The company via its policies/procedures and compliance department ensures that no one within our business and that of our partners (through auditing) are coerced to work. We are advocates and members of "Stronger Together" with regular surveys going out to our workers to identify any potential breaches.

Bonded Labour

The company undertakes weekly audits to check for duplicate information which will give us a strong indication of bonded labour or modern day slavery. Any item identified within the audit is investigated to ensure bonded labour/modern day slavery does not exist within our business. All staff are aware of our procedures for dealing with any suspicions and are reported promptly. Where the company believes that bonded-labour exists or any worker is being subjected to modern day slavery, it will contact the appropriate authorities.

Retained ID Documents by a third party.

The company through its ongoing compliance process, complaints policy, whistleblowing policy or HR Department will seek to identify if anyone has their ID documents retained by a third party, if identified, it will immediately alert the proper authorities to investigate.

Threat or Violence to work

The company has robust policies/procedures to ensure all workers are not subject to threat or violence whilst at work in accordance with HR28 Violence at Work policy. If identified through our compliance process or in the course that anyone is subjected to threat or violence to work, it will be internally investigated and reported to the appropriate authorities.

All of the above have been adopted to enable our workers to work lawfully and free from any hindrance or harm. The company continues to work ethically at all times in accordance with HR56 Ethical Trading policy.

The Director of HR is responsible in ensuring the standards of the Responsible Recruitment Policy are carried out, while the Managing Director has overall Accountability to ensure enough resource has been assigned to achieve the company overall Responsible Recruitment Strategy.