



Modern Slavery Policy

Introduction

What is Modern Slavery?

Modern slavery is a crime that involves the exploitation of people for their labour or commercial gain. It can take many forms, including forced labour, human trafficking, debt bondage, and child labour.

Communicate Recruitment Solutions recognises that modern day slavery is a global issue. We are committed to operating our business in a way that is free from modern slavery and human trafficking in all forms. We believe that all people have the right to be free from exploitation and abuse, and we are committed to ensuring that our business does not contribute to any form of human exploitation and forced labour.

This policy sets out our commitment to combatting modern slavery and outlines the steps we take to identify, prevent, and address any instances of modern slavery within our operations and supply chains.

1. Policy Statement

1.1 Prohibition of Modern Slavery

Communicate Recruitment Solutions prohibits the use of forced labor, human trafficking, and any form of modern slavery within our organisation and supply chains. We are dedicated to ensuring that all individuals involved in our operations, including employees, contractors, and suppliers, are treated with dignity, respect, and fairness.

1.2 Compliance with Applicable Laws

We will comply with all applicable laws and regulations related to modern slavery, including the Modern Slavery Act 2015, as well as any other relevant international standards.

1.3 Supply Chain Responsibility

We expect our suppliers and business partners to share our commitment to combatting modern slavery. We will work collaboratively with them to promote ethical and responsible practices throughout our procurement process, supply chains including supplier due diligence and contractual provisions.

2. Risk Assessment and Due Diligence

2.1 Risk Assessment

We will conduct regular risk assessments to identify and evaluate the potential risks of modern slavery within our operations and supply chains. These assessments will be based



on factors such as geographical location, industry sector, and the nature of the products or services involved.

2.2 Due Diligence

We will implement due diligence processes to assess and monitor our suppliers and business partners for modern slavery risks. This may include conducting audits, inspections, and evaluations to ensure compliance with our standards. We will also provide support and guidance to suppliers to help them improve their practices and mitigate modern slavery risks.

3. Training and Awareness

3.1 We will provide training and awareness programs to our employees and relevant stakeholders to ensure they understand the risks and indicators of modern slavery and know how to report any concerns.

3.2 As part of our Induction process, upon commencement of employment, all employees are made aware of our policies relating to standards of behaviour and how it applies to them. Our staff also undergo a digital modern slavery course.

3.3 We ensure annual update training is provided to all our employees.

3.4 We also provide training on awareness of modern-day slavery to our employees who have been identified as having responsibilities in finance and procurement.

3.5 All training will be periodically reviewed and updated to address emerging issues and maintain a high level of awareness throughout the organization.

4. Reporting and Whistleblowing

4.1 We encourage all employees, suppliers, and stakeholders to report any suspicions or concerns regarding modern slavery. We have established confidential reporting channels to allow for the confidential and anonymous reporting of potential violations of this policy. We will promptly investigate all reports and take appropriate action, including collaborating with law enforcement agencies where necessary and the modern day slavery hotline.

5. Monitoring and Review

5.1 We are committed to monitoring the effectiveness of this policy and our efforts to combat modern slavery. We will review and update this policy periodically to ensure it remains relevant and aligned with best practices, legal requirements, and stakeholder expectations.

6. Communication

6.1 This policy will be communicated to all employees, suppliers, and business partners. It will also be made available to the public on our website.



7. Responsibility and Accountability

7.1 The responsibility for implementing and maintaining this policy rests with the Senior Leadership and the Senior Operations Manager will be responsible for overseeing compliance with this policy, conducting risk assessments, and driving continuous improvement.

8. Contact Information

8.1 The Company has an HR Business Partner and any concerns about Modern Day Slavery in our business should be sent to HR@communicate-rs.com

Review

This modern slavery policy will be reviewed annually to assess its effectiveness, address emerging risks, and make any necessary updates or amendments.

Signed:

Imogen Paul, Senior Operations Manager

Date: 16/05/2023