

<b>Company Name:</b>	Twenty-Four Seven Recruitment Services Ltd					
<b>Policy Name:</b>	Preventing Hidden Labour and Preventing Exploitation					
<b>Review Date:</b>	V1 24.02.22	V2 13.03.24				

### Policy Statement

24-7 Recruitment Services Ltd commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

### Scope

This Policy applies to all staff and temporary-workers, business partners, including suppliers, service providers, subcontractors and 2<sup>nd</sup> tier labour providers are also required to adhere to the standards set out in this Policy.

The requirements in this Policy constitute minimum and not maximum standards and should not be used to prevent the exceeding of these standards. Where the provisions of law and this Policy address the same issues, both we, and our business partners must apply whichever provision affords the greater protection.

### Responsibility

The Board of Directors and Senior Leadership Team are responsible for supervising the implementation of and compliance with this policy. The Managing Director assumes operational responsibility for the implementation of and compliance with the declaration of the Policy.

It is the responsibility of all employees and workers throughout the business to ensure this policy is adhered to within all its recruitment practices.

The HR department will have overall responsibility for the policy and ensuring it is updated and upheld throughout the business.

### Policy Commitments

The Company and subsidiary companies shall:

1. Designate appropriate key managers to attend "Tackling Hidden Labour Exploitation" training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost and will not allow these to be paid by job seekers. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for.

4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Abuse Authority and police.
6. Provide information on tackling “Hidden Labour Exploitation” to our workforce and others through training, workplace posters, worker leaflets, induction and worker interviews.
7. Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and Workers to report such exploitation which may be occurring within their communities through workplace posters and information included in induction.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

#### **Review and improvement**

The Company commits to the principle of continuous improvement. Any systems in place must be regularly evaluated and assessed on the basis of measurable effectiveness, in accordance with changing environments, and be adapted or expanded as required. The HR Director will review and update this policy at regular intervals.