

MODERN SLAVERY STATEMENT

The Modern Slavery Act 2015 requires large employers to be transparent about their efforts to eradicate slavery and human trafficking in their supply chain. The act makes provisions about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims. In accordance with the act, this statement articulates our policies and practices around recognising and preventing human trafficking and slavery in the global supply chain. This statement is published in accordance with section 54 of the Act and relates to the financial year April 2020 to March 2021. It was approved by the Founder of My Talent Brand Recruitment on 1st April 2020.

RECRUITMENT AND EMPLOYMENT CONFEDERATION

My Talent Brand Recruitment are members of the Recruitment and Employment Confederation (REC). The REC Code of Professional Practice has been created to ensure that all members of the REC conduct their business ethically, to the highest standards and promote good practice. It is binding on all corporate members. My Talent Brand Recruitment adheres to the REC Code, which requires basic statutory compliance as well as higher ethical standards in 10 principles;

- Respect for laws
- Respect for honesty and transparency
- Respect for work relationships
- Respect for diversity
- Respect for safety
- Respect for professional knowledge
- Respect for certainty of engagement
- Respect for prompt and accurate payment
- Respect for ethical international recruitment
- Respect for confidentiality and privacy

1. Introduction

This statement sets out the actions that My Talent Brand Recruitment has taken to understand the potential risks to its business from modern slavery and to ensure that there is no slavery or human trafficking in its own business and its supply chains.

As part of the recruitment profession, My Talent Brand Recruitment recognises that it has a responsibility to take a robust approach to preventing slavery and human trafficking.

My Talent Brand Recruitment is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

2. Organisational structure and supply chains

This statement covers the activities of My Talent Brand Recruitment.. The business is based in Raunds, Northamptonshire, United Kingdom.

Formed in 2019, My Talent Brand Recruitment is a wholly owned company.

My Talent Brand Recruitment delivers recruitment services which help organisations in the public and private sectors attract people, knowledge and skills to enable business performance and accelerate change. We provide a breadth of solutions, tailored to our clients' specific needs, in permanent, contract, interim and managed recruitment, capable of providing people across all technical and business disciplines.

My Talent Brand Recruitment is committed to minimising its impact on the environment.

My Talent Brand Recruitments Supply Chains primarily comprise organisations within the UK. My Talent Brand Recruitment avoids contracting with suppliers or sub-contractors located in areas where there is a higher risk of slavery and human trafficking than there is in the UK or Europe. However, we recognise that our upstream supply chain does include countries with a higher risk of modern slavery or human trafficking, and we expect our suppliers to prevent and avoid slavery and human trafficking in their supply chains in higher risk countries. We also recognise that slavery and human trafficking does occur in the UK and Europe.

3. My Talent Brand Recruitments approach to preventing slavery and human trafficking

3.1 Relevant policies

The following policies define the steps My Talent Brand Recruitment has taken to prevent slavery and human trafficking in its operations and supply chain.

- Code of Ethics describes our commitment to the 10 principles of the UN Global Compact, including fighting against child labour and exploitation, forced labour or any form of compulsory labour.
- Sustainability Policy – applicable to all employees of My Talent Brand Recruitment this policy explicitly commits the company to preventing slavery. It also requires us to uphold human and labour rights.
- Business Integrity Policy – it is important to My Talent Brand Recruitment that any fraud, misconduct or wrongdoing by workers or officers of the Company that would threaten the integrity of the business, including any actions that might raise the risk of slavery or human trafficking, is reported and properly dealt with. The Company encourages all employees to raise any concerns that they may have about the conduct of others in their business dealings on behalf of the Company or about the way in which the business is run using the procedures outlined in this policy.
- Sustainable Procurement Policy – this policy applies to all procurement activity in the UK and requires My Talent Brand Recruitment to adhere to social and ethical standards, and human and labour standards in the procurement of goods and services. Our standard terms and conditions for suppliers also require suppliers to uphold human and labour rights and (in the UK) to prevent slavery and human trafficking in their own operations and supply chains.

3.2 Processes and practices

3.2.1 Within our own operations

Adherence to relevant employment legislation promotes human rights and largely prevents modern slavery. My Talent Brand Recruitment has a responsibility to ensure that workers are not being exploited, that they are safe at work and that relevant employment, health and safety and human rights laws are adhered to.

Employees and contractors are able to raise a suspected case of slavery or human trafficking within the Company's own operations by following the Company's internal Business Integrity Policy.

Due Diligence: My Talent Brand Recruitment takes the following steps to ensure there is no slavery or human trafficking within its own operations:

- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave the Company's employment. Employees are free to serve notice at any time.
- The Company carries out verification of an employee's identity and ongoing right to work in the UK and does not seek to withhold any of an employee's identity documents or passport etc.
- The Company pays all its employees the living wage foundation wage and adheres to all legislation in respect of working time and statutory time off, providing for minimum amounts of holiday, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks and periods.

3.2.2 Within our supply chain

My Talent Brand Recruitment recognises that our supply chain contributes the greatest risks for Slavery and Human Trafficking and as such our relationship with the supply base is a critical part of our commitment to eliminating modern slavery.

Key categories of spend comprise

My Talent Brand Recruitment undertakes robust due diligence when taking on all new suppliers, and regularly reviews its existing supply chain. The company uses a Sustainability Risk Matrix, which covers more than a dozen key sustainability risk areas and determines levels of risk by supply category. Using the Sustainability Risk Matrix we broadly map the supply chain to assess particular products or geographical risks of modern slavery and human trafficking. We identify suppliers in categories of supply with higher levels of risk, and with which we maintain a spend above a certain threshold, and invite them to participate in our supplier engagement process, which includes a more thorough assessment of their sustainability management processes, including those for the prevention of slavery and human trafficking.

We are continually making improvements to our ongoing monitoring and assessments of suppliers and work closely with key suppliers to share best practice and provide opportunities to build open discussions and improve existing safeguards.

- Suppliers with higher overall sustainability risk scores must provide detailed information on their human rights policies and processes, both within their own organisation and their supply chain.
- The supplier onboarding process incorporates a sustainability assessment of every new supplier where they have to provide evidence of sustainability processes and policies
- During the last twelve months we have implemented a programme to ensure that all suppliers must confirm their acceptance of our Supplier Code of Conduct, which prohibits slavery and human

trafficking, and requires them to take proactive steps to ensure that slavery and human trafficking do not occur in their operations or supply chains.

- We assist suppliers to help improve their practices, including providing advice and guidance on best practice, working with them on implementing action plans for improvements.
- My Talent Brand Recruitment has a policy of invoking sanctions- including the termination of business relationships or contracts - against suppliers that fail to improve their performance in line with an action plan or seriously violate our terms and conditions.

3.3 Engaging Workers

As experts in the supply of agency labour, we are committed to respecting international human rights and fair labour practices. Where we engage Contractors through their Personal Service Companies (where they are most often employed as the sole employee) we conduct rigorous pre-placement compliance checks including eligibility to work, references, qualifications and proof of national insurance numbers, this includes a requirement to comply with the Modern Slavery Act 2015 and the Supplier Code of Conduct. Where we engage via Agencies, this also requires the agency to comply with the Modern Slavery Act 2015 and the Supplier Code of Conduct and is contained in our updated Contractor and Agency contracts and existing stakeholders will be required to comply on renewal.

3.4 Training and awareness-building

My Talent Brand Recruitment ensures that all new joiners to the company are briefed on the Modern Slavery Act 2015 as part of their induction. Employees who have roles dealing with suppliers, such as the Procurement Team, attend regular training sessions to help them understand the risks of human trafficking and how to spot potential dangers through both the initial supplier on boarding process and subsequent suppliers reviews and assessments.

4. Performance indicators

My Talent Brand Recruitment has established the following key performance indicators (KPIs) in response to the introduction of the Modern Slavery Act 2015. These indicators effectively establish the activities the Company plans to carry out. The indicators and activities are reviewed at least annually.

- Incorporating into our standard purchasing terms and conditions the requirement for suppliers to work to prevent slavery and human trafficking.
- Maintaining a procurement risk matrix and assessment process that includes slavery and human trafficking, in order to assess the risk areas of our supply base on an ongoing basis, expanding this to cover a greater number of suppliers.
- Integrating the topic of slavery and human trafficking into our supplier engagement processes for sustainability.

5 Responsibility

Responsibility for My Talent Brand Recruitment's initiatives addressing slavery and human trafficking is as follows.

5.1 Policies:

Responsibility for policies is:

- Kyle Hoy - My Talent Brand Recruitment for policies related to the operation of the business

5.2 Risk assessments:

Our Sustainable Procurement Lead and other members of our Sustainability team conduct risk assessments as part of our Sustainable Supply Chain Management programme.

5.3 Due diligence:

The Human Resources team is responsible for ensuring that the Company adheres to all employment law in the due diligence checks undertaken during different stages of employment, from initial recruitment onward.

In our procurement and supply chain management activities: the Company's Procurement management team are responsible for undertaking due diligence activities, and for such activities related to slavery and human trafficking; they take input from other parts of the business, including Legal, HR and Sustainability.