

MODERN SLAVERY & ETHICAL CONDUCT POLICY

Serply Recruitment Ltd

1. Policy Statement

Serply Recruitment Ltd has a zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude, and any form of exploitation.

We are committed to acting ethically, with integrity, and with transparency in all business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere within our business or supply chains.

We recognise our responsibilities under the Modern Slavery Act 2015 and are committed to complying with all applicable legislation and best practice standards.

2. Scope

This policy applies to:

- Employees, directors, and representatives of Serply Recruitment Ltd
- Candidates, temporary workers, and contractors supplied by Serply Recruitment Ltd
- Clients, suppliers, and business partners
- All recruitment and labour supply activities across industrial, engineering, construction, and commercial sectors

This policy applies across all locations and operations within the United Kingdom.

3. Purpose

The purpose of this policy is to:

- Prevent modern slavery and human trafficking within Serply Recruitment Ltd operations
- Identify and mitigate risks within recruitment processes and supply chains
- Ensure compliance with legal and ethical standards
- Promote awareness of exploitation risks
- Provide clear reporting mechanisms for concerns

4. Definitions

Modern slavery may include:

- Human trafficking
- Forced or compulsory labour
- Debt bondage
- Servitude

- Child labour where unlawful
- Exploitative working conditions

Exploitation may include coercion, threats, withholding of wages, excessive deductions, or restriction of movement.

5. Our Commitments

Serply Recruitment Ltd will:

- Conduct business in an ethical and transparent manner
- Carry out reasonable due diligence on clients, suppliers, and partners
- Ensure recruitment processes are fair, lawful, and free from coercion
- Verify the identity and right to work of all workers
- Ensure workers are engaged voluntarily and paid correctly
- Not charge workers unlawful recruitment fees
- Promote awareness of modern slavery risks internally and externally
- Take appropriate action where concerns are identified
- Where applicable, publish a Modern Slavery Statement in accordance with statutory requirements

6. Risk Areas

Serply Recruitment Ltd recognises that modern slavery risks may arise in:

- Labour supply chains
- High-risk sectors such as construction and industrial environments
- Use of subcontractors or intermediaries
- Workers who may be vulnerable due to language barriers, immigration status, or financial hardship

7. Due Diligence and Controls

Serply Recruitment Ltd will:

- Conduct identity and right to work checks
- Assess clients and assignments for potential risk
- Monitor recruitment practices
- Ensure transparent pay arrangements
- Avoid engagement with organisations known to be involved in exploitative practices

8. Responsibilities

Serply Recruitment Ltd will:

- Implement and maintain appropriate policies and procedures
- Provide guidance and awareness to staff
- Monitor compliance with this policy

Employees and representatives must:

- Remain alert to signs of exploitation
- Follow recruitment and compliance procedures
- Report concerns promptly

Clients and suppliers are expected to:

- Operate in compliance with applicable laws
- Not engage in exploitative practices
- Cooperate with reasonable due diligence measures

9. Indicators of Modern Slavery

Potential indicators may include:

- Workers appearing fearful, withdrawn, or controlled
- Lack of control over personal identification documents
- Unexplained wage deductions
- Excessive working hours without proper breaks
- Workers being transported or housed in unusual or restrictive conditions

10. Reporting Concerns

Any concerns regarding modern slavery or exploitation must be reported to Serply Recruitment Ltd immediately.

Serply Recruitment Ltd will:

- Take all reports seriously
- Investigate concerns appropriately
- Take corrective action where required
- Escalate to relevant authorities where necessary

11. Protection for Whistleblowers

Individuals raising concerns in good faith will be protected from victimisation or detriment.

This policy should be read alongside the Whistleblowing Policy.

12. Breach of Policy

Any breach of this policy may result in:

- Termination of contracts or assignments
- Removal of workers or suppliers
- Disciplinary action
- Reporting to relevant authorities

Serply Recruitment Ltd reserves the right to terminate relationships with clients, suppliers, or partners where there is evidence or reasonable suspicion of modern slavery or unethical practices.

13. Record Keeping

Serply Recruitment Ltd will maintain records of:

- Due diligence checks
- Reported concerns
- Investigations and outcomes

All records will be handled securely and confidentially.

14. Training and Awareness

Serply Recruitment Ltd will:

- Promote awareness of modern slavery risks
- Provide guidance to relevant staff
- Encourage vigilance across all operations

15. Relationship with Other Policies

This policy should be read alongside:

- Whistleblowing Policy
- Equality Policy
- Anti-Harassment Policy
- Data Protection Policy

16. Monitoring & Review

This policy will be reviewed annually, or sooner where necessary, to ensure it remains effective, compliant, and aligned with current legislation and best practice.

17. Contact

For further information regarding this policy, please contact:

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01244 646 892