



<b>Company Name:</b>	Gold Staff Recruitment
<b>Policy Name:</b>	Modern Slavery Acknowledgment.
<b>Date:</b>	03 <sup>rd</sup> September 2019
<b>Version:</b>	1.1

Gold Staff Recruitment Limited are aware of the 2015 Modern Slavery Act. As we grow in size, Gold Staff will ensure that training is provided to internal staff on the act as part of the businesses continuous improvement, recruitment and equal opportunities protocol.

At present Gold Staff's obligation to comply with the act will apply once the business achieves a turnover of £36million or more. However, Gold Staff Recruitment advocate good working conditions and equal opportunities at every level at all times.

Once the turnover threshold has been achieved, Gold Staff Recruitment will produce a statement on our policy for Modern Slavery and will have a risk assessment, compliance and will conduct due diligence of all workflows and processes.

Should there be a change in legislation, this will be reviewed accordingly.

### **Modern Slavery Policy**

**Anti-Slavery and Human Trafficking Policy** Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this process, we have undertaken a review of our supply chain to identify and



assess potential risk areas and maintain a register detailing the same. We have identified that one of our departments, International Institutions and Donor Assurance, potentially poses a higher risk given the locations in which services are provided. Further information is contained in an appendix to our Anti-Slavery and Human Trafficking statement.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

**RESPONSIBILITY FOR THE POLICY** The management of the firm has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all our people comply with it.

The legal department has primary and day-to-day responsibility for implementing this policy, the legal team provide assistance with reviewing the risk profile of our candidates and clients to ensure that any procedures implemented are effective in countering modern slavery.

**COMPLIANCE WITH THE POLICY** You must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under



our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Although you should report any concerns regarding modern slavery and/or human trafficking in any parts of our business or supply chains in accordance with our whistleblowing policy, you are also encouraged to discuss a specific matter (or our policy or relevant legislation) with any member of the legal department.

If you are in any doubt about whether a particular act or working conditions in any of our business relationships may contravene any aspect of this policy then on the side of caution and report it in accordance with the whistleblowing policy, or speak to a member of the legal department.

We encourage openness and will support anyone who raises genuine concerns in good faith in accordance with the firm's whistleblowing policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our business or in any of our supply chains.

**COMMUNICATION AND AWARENESS OF THIS POLICY** Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

**BREACHES OF THIS POLICY** Any employee who breaches this policy could face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.