



Modern Day Slavery

Report FY 2022

First Recruitment Group has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings. We are also committed to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

First Recruitment Group will not support or deal with any business knowingly involved in slavery or human trafficking.

Supply Chain:

Our supply chain is broadly split into two:

- 1) Suppliers of services such as job boards; HR, IT, and financial services software; other recruitment companies plus umbrella companies etc. In most instances these are global tier-one brands; are approved by the recruitment trade body APSCo and/or have their modern slavery statements listed on their websites.
 - Recruitment and umbrella companies are subject to regular audits.
- 2) Suppliers of building services: we require all contractors to confirm they support our modern slavery position plus confirm they are not involved in modern slavery or human trafficking.
 - Contractors may be subject to audit on a random or with-cause basis.

Risk:

We therefore consider our supply chain to be low-risk.

Training:

Modern slavery awareness training is conducted at the employee induction and then on a periodic/refresher basis



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Policies:

The following policies remain valid:

- *Anti-Bribery and Corruption Policy*
- *External Provider Management Policy*
- *Modern Day Slavery Policy*
- *Whistleblowing Policy*

Due Diligence Processes for Modern Day Slavery and Human Trafficking:

Control of our suppliers is managed through the following:

- *Audit Schedule* (includes supplier audits)
- *Building Log* (building services contractors)
- *Critical Supplier Approval and Monitoring Process*
- *Master List of Approved Suppliers* (job boards etc)
- Periodic Risk Assessment
- *Risk and Complaint Register*

Performance Indicators:

Any supplier issues or indeed general concerns about our policies are brought to the attention of senior management at the periodic *Management Review*.

I am therefore confident that we have appropriate policies and processes in place regarding modern slavery and human trafficking. However, we must of course remain vigilant.

Mohinder Dhiman

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Group Client Services Director