

## **POLICY STATEMENT**

*Grafters Recruit Ltd* recognises the responsibility that they share with their suppliers to provide remedy to victims of slavery. Successful remediation is not easy to achieve and requires a victim-led, consultative and multi-stakeholder approach. The policy below is drawn from best practice guidance on remediation and builds on the requirements of ILO Conventions, Protocols, Recommendations and Instruments such as the Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and the UN Guiding Principles on Business and Human Rights. The policy is intended to provide a practical framework for businesses to apply remedy should they encounter victims of slavery in their business or in their supply chains.

## **Coverage**

This policy is designed to ensure a strict procedure is followed where Grafters Recruit Ltd, our clients or candidates suspect a case of modern slavery.

## **Responsibility**

The board of Directors are responsible for the wording and ongoing direction of this policy.

Branch Managers are responsible for ensuring any cases identified by them and their staff is escalated to the board of directors in line with this policy.

## **Basic Principles**

These principles apply to all workers regardless of their employment status or length of service. This includes permanent, temporary or casual labour, whether directly or indirectly employed. The response to a situation of forced labour will depend upon the scale of the issue identified.

## **Remediation Procedures**

If modern slavery is found, it is vital to act quickly and to protect the victim.

### **Step One: Definition of a complaint**

Grafters Recruit Ltd defines a complaint as a report of violation against Grafters Recruit Ltd Code of Conduct that has occurred in Grafters Recruit Ltd's supply chain and has a direct adverse human rights impact. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.

### **Step Two: Designing a remediation procedure**

Grafters Recruit Ltd recognises that it is important to identify and establish a remediation team in order to develop the business's remediation procedure. This should be made up of representatives from the workforce, managers, trade unions (if active in the workplace) and local NGOs with expertise in modern slavery and forced labour where available. If there is an existing government or civil society-backed organisation, process or project providing remedy for victims of modern slavery, these should be identified and involved in the development of the remediation procedure.

Protecting the victim of slavery must be the first priority of the remediation programme. The remediation team must understand the specific needs, circumstances and aspirations of each victim and what it was that pushed them into modern slavery.

Grafters Recruit Ltd will take the following steps in designing its remediation procedure:

1. Identify a remediation team, including local experts where available
2. Define the roles and responsibilities of each party
3. Decide who will be funding the remediation programme
4. Document what would constitute a grievance and what information the complainant should be able to provide to demonstrate the relevance and seriousness of the complaint
5. Document what channels are available to workers and relevant third parties for raising grievances
6. Ensure that workers and relevant third parties are aware of all of these channels
7. Document how the Company will carry out an investigation, should an incident of modern slavery be identified
8. Identify and document what remedy the business will offer to victims of modern slavery, including restitution (restoring victim to original situation before abuses occurred), compensation (financial or otherwise), rehabilitation (medical, physiological or psychological care) and satisfaction and guarantee of non-repetition
9. Identify and document relevant government and/or civil society-backed support mechanisms that victims of slavery can access
10. Ensure that the procedure acknowledges that victims have the right to pursue other forms of remedial action at any stage beyond internal remedy mechanisms
11. Decide and document how the business will contribute to programmes to assist victims of modern slavery, e.g. through vocational training or other appropriate measures
12. Decide and document how the outcomes of any investigation will be communicated, bearing in mind the need to protect victims
13. Establish a review procedure to ensure that the remediation policy is effective and to review the root causes of any incidents of modern slavery
14. Share the remediation procedure with all workers on site.

### Step Three: Dealing with a case of modern slavery

**Protecting victims of slavery is the most fundamental principle of any remediation policy.** Grafters Recruit Ltd acknowledges that, once an allegation of modern slavery is made, victims should be:

- Taken to a place of safety, out of view
- Supported by a colleague or trade union representative if possible
- Provided with reassurance and welfare (food, drink, medical assistance)
- Informed of the business's remediation procedure and the support that is available to them
- Asked what remediation they are looking for, e.g. financial, psychological support
- Given access to relevant government or third-party remediation services.

**At all stages, Grafters Recruit Ltd will take steps to protect confidentiality and collect evidence including:**

- Ensuring that suitable managers are responsible for running the investigation without links to the allegations
- Recording what the victim says and making full notes of all the circumstances

- Keeping multiple victims separate, speaking to them individually and noting signs of suspects trying to make contact
- Having an independent/telephone interpreting service ready to use.

The Grafters Recruit Ltd process for responding to violations will be to:

1. Notify the board of Directors who will then Conduct an initial assessment of the allegations to ensure that there is sufficient information to understand the exploitation discovered and remedy it
2. Ascertain if a supplier or labour provider is implicated
3. Report the allegations to relevant authorities
4. Capture evidence about the violations, using an independent third party if necessary
5. Gather information from those affected
6. Take steps to correct the situation for the worker
7. Contribute to programmes and projects to assist the victims of slavery
8. Work with local authorities and competent local organisations to provide assistance
9. Review progress over a suitable time period and verify that progress with local authorities and local organisations
10. Document remedial steps taken (see Remediation Reporting Tool)
11. Build learnings into remediation procedures and operational procedures to prevent re-occurrence.

#### **Step Four: Ongoing support and monitoring**

It is important for Grafters Recruit Ltd to monitor the progress of the remediation programme and to provide ongoing support for victims of slavery. Monitoring will include the following steps:

- Monitoring the victim's progress if the victim has been referred to a government or civil society-managed referral mechanism or similar
- Evaluating how effective the remediation procedure was and amending it accordingly
- Reviewing internal policies and procedures to determine what needs to change to prevent slavery from re-occurring.

Ongoing support required should be determined with the victim. It may take the form of a financial stipend whilst the victim is not working.