

MODERN SLAVERY POLICY

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and been approved by the Directors of Grafters Recruit Limited.

Grafters do not believe there is any place in today's world for slavery or human trafficking. We are committed to continually improving our practices to combat slavery and human trafficking and to encourage the same high standards from our supply chain and other business partners. We choose to engage and partner with like-minded organisations because they recognise people should be treated with dignity and respect.

Key Commitments;

- ✓ Grafters is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
- ✓ Grafters is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
- ✓ Grafters provides appropriate training and awareness information for its entire staff. In particular:
- Members of our Leadership Team receive detailed Stronger Together training in identifying and resolving concerns around modern slavery and human trafficking.
- ✓ All our staff across the business undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- ✓ All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
- ✓ Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to onsite managers or their branch manager.
- ✓ Reports surrounding these issues are taken extremely seriously by our Senior Leadership team who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - ✓ Working with the appropriate organisations to improve standards,
 - ✓ Working with our Clients to improve standards, passing details to appropriate law enforcement bodies.
- ✓ We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
 - ✓ Randomly selected workers are interviewed on a monthly basis to ensure there are no safeguarding or modern slavery issues
 - ✓ Weekly payroll reports to check for duplicate bank details and duplicate addresses
- ✓ We would also recommend reading this in conjunction with our other policies, including our:
 - ✓ Ethical Trading Policy
 - ✓ Anti-bribery / corruption policy, and
 - ✓ Whistle-blowing Policy

This policy was adopted on 2nd January 2024 after being agreed by our Senior Leadership Team. It is reviewed annually.