



## ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

GR8 Employment Solutions and Training Limited (the “**Company**”)

**Date: 16<sup>th</sup> March 2023**

### **Policy Statement**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking (together “**Modern Slavery**”). The Company has a zero tolerance approach to modern slavery and is committed to acting ethically, with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that Modern Slavery, in any of its forms, is not taking place anywhere within either its own business or in any of its supply chains. The Company also expects the same high standards from all of its clients, suppliers, contractors, and other business partners (“**Business Partners**”) and, as part of its contracting processes, it includes specific prohibitions against the use of Modern Slavery, and expects that its Business Partners will in turn hold their own suppliers to the same standards.

Identifying potential victims of Modern Slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse, and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of Modern Slavery in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the Company or on the Company’s behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants, and business partners.

### **Our Values**

The Company is a leading specialist recruitment company in Jersey with a passion for doing recruitment better.

Our core principles include:

- ✓ **Safety** - Consistently working safely and to best practice.
- ✓ **Professionalism** - Providing a quality service to clients and Business Partners to reach their goals and objectives by professional working and a positive attitude.

- ✓ **Integrity** - Honesty, trustworthy and respectfulness. We are committed to the highest ethical standards - it is what our candidates, partners and clients rightly expect from us.
- ✓ **Team Management** - We are not one person; we are a team who shares and works by our values and standards.
- ✓ **Free and Open Communication** - We communicate within our business at all levels offering an environment of participation and creativity for all of our team and we personalise our communication to our clients.
- ✓ **Inclusion** - Our inclusion is reflected through workforce diversity and community involvement.
- ✓ **Accountability** - We are accountable to our clients, team, and our shared community.
- ✓ **Client Satisfaction** - The end result of our efforts must be a satisfied client. Our reputation is key to the Company's longevity in our field and will remain the key to success.

### **Responsibility for the Policy**

The Board of Directors of the Company has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

The Off Island Director has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

### **Compliance**

The prevention, detection, and reporting of instances of Modern Slavery in any part of the Company's business or supply chains, whether in Jersey or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify a Director or report it in accordance with the Company's whistleblowing policy. You are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of Modern Slavery, please raise it with your line manager.

The Company aims to encourage openness and will support anyone who raises genuine concerns, in good faith, under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting, in good faith, their suspicion that Modern Slavery is or may be taking place in any part of its business or in any of its supply chains.

## **Our Process for Managing Risk**

The Company is committed to working with reputable Business Partners, and it regularly reviews its supply chains. In addition to this, the Company assess the risk of Modern Slavery by using the following processes:

- Continually evaluating the Company's existing supply chain;
- Reviewing the potential for any risk at regular intervals; and
- Promoting the Company's whistle-blowing policy which encourages employees to report any malpractice or illegal acts using a prescribed reporting procedure.

## **Training and Communication**

Regular training on this policy, and on the risk that the business faces from Modern Slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and Modern Slavery and how to report suspected cases.

The Company's zero tolerance approach to Modern Slavery must be communicated to all Business Partners when entering into new or renewed contracts with them.

## **Breach of the Policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with any of its Business Partners if they breach this policy and/or are found to have been involved in Modern Slavery, without notice.

## **Moving Forward**

After due consideration, the Company has **not** identified any significant risks of Modern Slavery trafficking in its supply chain at this time. The Company will, however, continue to be alert and vigilant in identifying and mitigating risk areas for modern slavery and human trafficking in its business and supply chains and will continue to review, develop, and promote its policies and practices in this important area.

***This policy has been approved by the Board of Directors of GR8 Employment Solutions and Training Limited on 16<sup>th</sup> March 2023 and will be reviewed annually.***