



# Modern Slavery Policy Statement

Version 8 – 01.07.2025



## MODERN SLAVERY POLICY STATEMENT 2025

### INTRODUCTION TO MODERN SLAVERY

Modern slavery can take many forms, including the trafficking of people, forced labour, servitude, and slavery. Any consent victims have given to their treatment will be irrelevant where they have been coerced, deceived, or provided with payment or benefit to achieve that consent.

The number of people identified as victims of modern slavery has been rising year on year. While it is impossible to know the full extent of modern slavery in the UK, the Home Office release data to demonstrate the numbers of people referred to authorities. The 2024 statistics are the highest number of referrals since the records began in 2009 and almost double that of 2020.



**50 million people worldwide are in modern slavery**



**Estimated 130,000 victims in the UK are in modern slavery, according to UK government**



**19,125 potential victims of modern slavery referred to the NRM in 2024, almost double that of 2020**



**23% of people referred were British Nationals**



**Estimated that the UK imports £20 billion worth of goods that are at risk of having been made with forced labour**

In 2024, labour exploitation was the most common form of slavery in the UK, followed by criminal exploitation. The Company reviews the National Statistics each quarter upon release to identify any new areas of concern or consideration and to map our locations against the volume of NRM referrals so we know where additional measures and focus may need to be attributed.

This statement is made as part of The Company's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015. It summarises how The Company operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified, how we monitor them, how we train our staff, our commitments as an organisation, performance against previous years objectives, case studies and our current year objectives.

### OUR BUSINESS

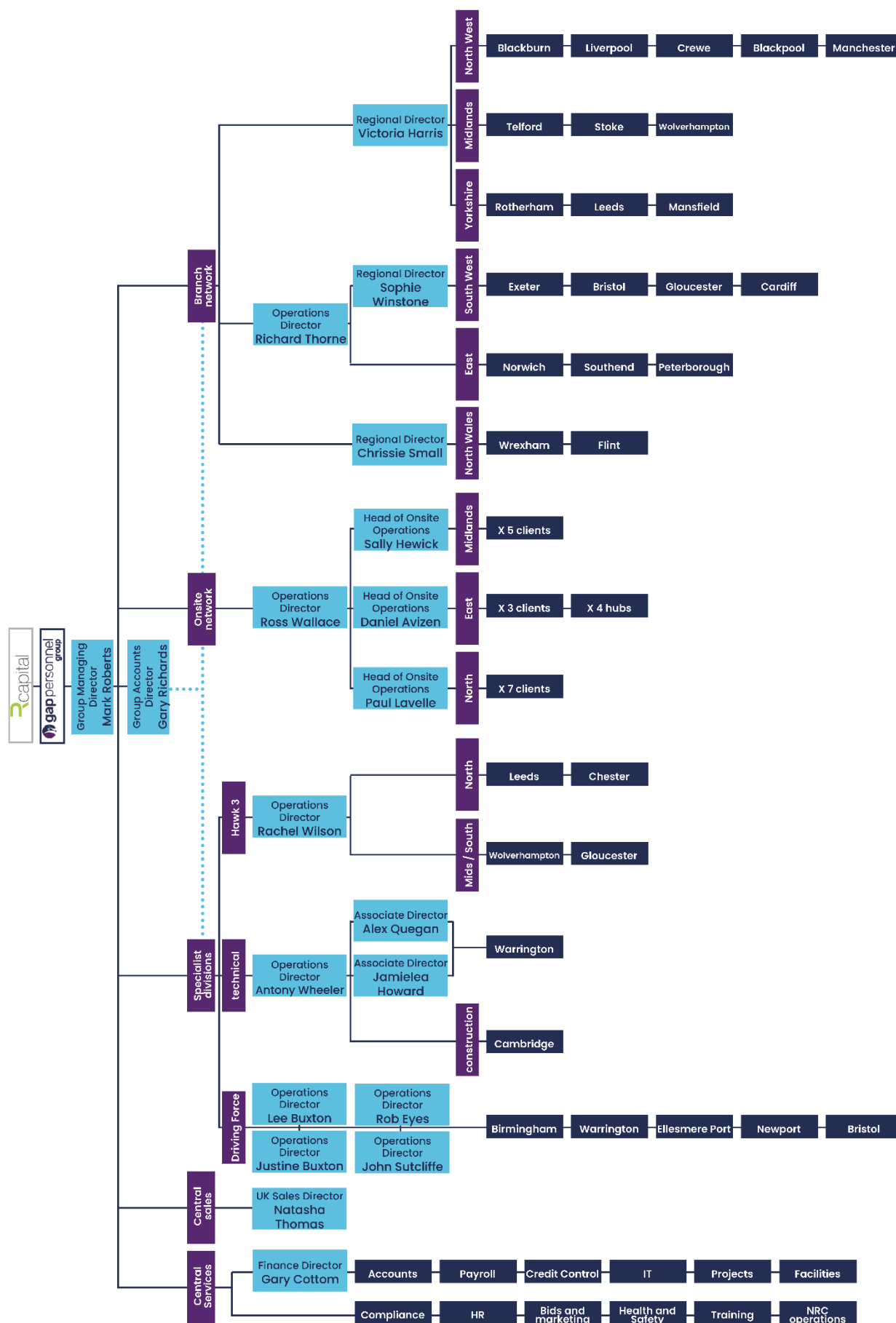
From a small independent staffing provider established in North Wales in 1998, gap personnel group has grown to be one of the largest recruiters in the UK. We're now a team of almost 300 professionals working across more than 50 high-street branches and onsite client locations. When it comes to operational delivery we're structured by specialism, supporting temporary, contract, and permanent requirements, across entry-level and semi-skilled roles through to technically skilled and professional placements. With a turnover of £185 million in 2024, we currently payroll up to 10,000 temporary workers each week and cover more than 2.5 million shifts each year. In 2025 we became part of R Capital's strategic portfolio, which not only makes us a secure and sustainable choice for our customers but enables us to continue to actively invest in our customer solutions, enhancing our systems, process and products as we continue to grow.

The sectors believed to be most affected by slavery and human trafficking are construction, agriculture, textile, security, and food processing and packaging, constituting much of The Company's core business. As a leading recruiter in the UK operating within these key sectors, The Company realise that we are at the front line of the recruitment process and our position is key to raising awareness of modern slavery and tackling the problem of hidden labour exploitation. The Company are committed to developing and adopting a proactive approach to tackling hidden labour exploitation. Our clients range from market-leading multinationals through to SMEs and start-ups. All our clients, work seekers, and temporary workers, are known to, and identified by our staff during the client on boarding and candidate registration process as applicable. This policy is applicable to all offices and operations within The Company structure and footer. Please note Driving Force Recruitment Limited is a recent acquisition and as such throughout the 2025-2026 period activity is taking place to align the policies, procedures and systems with the rest of the group. As such at present not all items mentioned will apply.

### MEMBERSHIPS, PARTNERSHIPS, ASSOCIATIONS AND CREDENTIALS

In recognition of the responsibility of The Company to our clients, candidates, employees and contractors, it is a fundamental value of The Company that all of its business and other practices be conducted at all times in compliance with all applicable laws and regulations of the countries in which it operates, its officiating bodies and associations. This is demonstrated by being GLAA licence holders (applicable to companies as detailed within the footer), working amongst the Compliance Intelligence Network CIN, which is a collaboration of Employment Businesses and Agencies within the UK with a shared focus to work together to help tackle modern slavery and assist in the rescue victims, and through our long-standing relationships with the following organisations:





## TACKLING MODERN SLAVERY AND HIDDEN LABOUR EXPLOITATION

The Company is committed to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

**Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

**Debt-bonded labour** is where a person's labour is demanded as a means of repayment for a loan or service.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

## MANAGING RISK

We understand that conducting thorough practices and applying due diligence in advance of any engagements we enter into, whether they be with clients, applicants, our direct employees or third-party suppliers, is critical to managing the risk of modern slavery and hidden labour exploitation occurring within our business and/or our supply chains. All associated persons, affiliations and suppliers of The Company are expected to familiarise themselves with our Modern Slavery Statement and supporting policies and commitments and operate themselves in a manner which supports our methodology and vision of eliminating the exploitation of people under the Modern Slavery Act 2015 and ensuring this does not occur within our supply chain.

## TRAINING

In line with our commitment to identifying any potential signs of modern slavery, forced labour or human trafficking, and ultimately preventing labour exploitation from occurring within our operation, we have sourced, developed and undertake the following training programmes:

### Internal training

The Company recognises that its key resource is the people that it employs. We are committed to investment in our people, by providing training we aim to enhance performance and ultimately, productivity through empowerment to make the best use of an individual's natural ability.

- The initial training plan will be made up of in branch training, e-learning modules and attendance to classroom training for specific courses, including investigative interviewing skills sessions put together as a bespoke training package for The Company by former GLAA investigators;
- Included within the E-Learning training sessions is an interactive module on spotting the signs of Modern Slavery which is to be completed by all new starters and refreshed annually;
- All new starters are asked to commit to preventing labour exploitation by signing and agreeing to the 'Recruiter Compliance Principles' document viewable in The Companies Recruitment and Engagement Policy & Process handbook;
- All internal training courses are informally refreshed and updated as required to ensure the content remains current.

The aims of internal training are to:

- Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for to help spot potential cases;
- Upskill all staff responsible for directly recruiting workers in regard to investigative interview skills, critical to establishing a full understanding of an individual's background / journey which lead them to the recruitment service;
- Ensure that labour sourcing, recruitment and worker placement are under the control of trusted and competent staff members;
- Adopt a proactive approach to reporting suspicions of worker exploitation to the GLAA and the police.







### External training

- Our Compliance Team members that specialise in Social and Ethical Compliance have attended "Tackling Modern Slavery in Global Supply Chains" and "Tackling Modern Slavery in UK Businesses" hosted by Stronger Together and "Modern Slavery in Business" and "Modern Slavery in Construction" hosted by Unseen;
- Regular attendance to ALP and Stronger Together Roadshows and/or webinars and GLAA roundtable events;
- External training is sourced and attended as required based on individual staff needs.

The aims of the external training are to:

- Ensure that our internal Compliance Team are up to date with current industry guidance and best practice processes so that they may effectively support our operational teams with situations that may arise;
- To identify new methods and processes that can be implemented into our business, ensuring a proactive approach to tackling modern slavery within our organisation and that of our supply chain.

## COMMITMENTS

 <p>THE COMPANY</p>	<ol style="list-style-type: none"> <li>1. Designate appropriate managers from the internal compliance team to attend “Tackling Hidden Labour Exploitation” training and to have responsibility for developing and operating company procedures relevant to this issue.</li> <li>2. Accept that job finding fees are a business cost and will not allow these to be paid by job applicants.</li> <li>3. Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third-party labour exploitation and signs to look for, having completed Modern Slavery training as part of our corporate induction process and having signed the appropriate Recruiter Compliance Principles policy document.</li> <li>4. Delivery of annual refresher training across The Company network in relation to Modern Slavery, Investigative Interview Techniques, GDPR, Fraud Prevention, Health and Safety, Mental Health and Wellbeing, Equality and Diversity and unconscious bias.</li> <li>5. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.</li> </ol>
 <p>WORKERS</p>	<ol style="list-style-type: none"> <li>1. Provide information on tackling “Hidden Labour Exploitation” to our workforce through the sending of Stronger Together leaflets as part of the onboarding process specifically contained within the ‘welcome email’ and displaying the Stronger Together posters in all of our offices and onsite operations.</li> <li>2. Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.</li> <li>3. The safety and welfare of our workers is paramount to our business principles, as such, the below processes and practices have been designed, developed and implemented with the intention of ensuring our workers’ safety and welfare following placement with The Company and our clients. <ul style="list-style-type: none"> <li>• Complete quarterly Common details checks across the workforce data to include,</li> <li>• Conduct quarterly Stronger Together questionnaires with all live workers</li> <li>• Conduct 150 face to face worker interviews annually by trained members of the Compliance Team</li> </ul> </li> </ol>
 <p>CLIENTS</p>	<ol style="list-style-type: none"> <li>1. Endeavor to consult with clients, identifying and providing any support, training, guidance requested in respect of the development or management of their own Modern Slavery programmes or Supply Chain Due Diligence activities.</li> <li>2. Promote our Modern slavery Client Collaboration Strategy with key clients. A programme which seeks to cross reference ‘common details’ of clients directly employed worker records with our temporary worker records. This process will ensure modern slavery alerts from common details checks are maximised compared to each organisation completing their own in isolation. Significant work has gone into establishing how this can be achieved without any risk of breaching GDPR, we are hopeful clients will embrace this collaboration strategy.</li> </ol>
 <p>SUPPLIERS</p>	<ol style="list-style-type: none"> <li>1. Our supply chain is categorised as High, Medium or Low risk, determined by the nature of the supplier’s business operation and the level of direct access to our workforce. Suppliers categorised as: <ul style="list-style-type: none"> <li>• High Risk are those that have the most direct connection to or involvement with workers such as second tier labour suppliers. All High-Risk suppliers are required to undergo annual audits, where any issues or cause for concern are identified, further investigation and remedial actions will be taken, and a re-audit scheduled and completed. Failure to rectify issues identified and/or where the severity of the issues identify are deemed necessary, supplier arrangements will be ceased without notice.</li> <li>• Low risk - Annual circulation of mailers about How to become a Stronger Together Business Partner to increase knowledge and awareness at this level.</li> </ul> </li> <li>2. Our full Supplier Due Diligence process will be shared with employees as part of our internal training process and externally with clients and/or suppliers as part of an audit process. The Company will not use any individual or organisation to source and supply workers where they: <ul style="list-style-type: none"> <li>• Have not been signed off by the central compliance team following successful completion of The Company Supplier Due Diligence Process;</li> <li>• Do not hold a valid GLAA licence, save where a valid GLAA exemption is approved by the central compliance team;</li> <li>• Have not confirmed that workers are not being charged a work finding fee.</li> </ul> </li> <li>3. Regularly review our supplier due diligence process and audit process, implementing any additional processes as identified within the review.</li> </ol>
 <p>EXTERNAL BODIES</p>	<ol style="list-style-type: none"> <li>1. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Labour Abuse Authority (GLAA) and police.</li> <li>2. Consistently seek to create new partnerships to join together to tackle modern slavery, share intelligence where permitted and strengthen our network to identify, assist and support victims of modern slavery.</li> <li>3. Establish relationships with anti-slavery organisations / charities to further strengthen The Company’s knowledge, exposure and continued education on the topic and strategy of tackling modern slavery;</li> </ol>
 <p>INNOVATIONS</p>	<ol style="list-style-type: none"> <li>1. As a front-line Recruitment Agency, we acknowledge that we are in an ideal position to identify alerts of modern slavery. Through innovation and investment of our dedicated CRS software The Company has automated a number of processes to effectively complement our detailed practices enabling the identification of potential victims early on within our recruitment process into reducing the exposure of our business to instances of modern slavery.</li> </ol>



## 2024 PERFORMANCE AGAINST MODERN SLAVERY OBJECTIVES

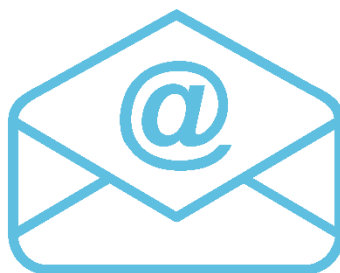
The company objectives for 2024 and performance against those is indicated below ( ∞ indicates an objective that is still in progress):

- ∞ Continued investment into further development of our Candidate Registration System (CRS). To incorporate:
  - ✓ 2-way API with our CRM system extending the automation of common details checks across all systems data and
  - ∞ implementing the dynamic interview questioning which could not be achieved for the initial implementation to enhance the current mechanisms in place to identify potential modern slavery victims during the onboarding process
- ✓ Delivery of annual refresher training across The Company network in relation to Modern Slavery, Investigative Interview Techniques, GDPR, Fraud Prevention, Health and Safety, Mental Health and Wellbeing, Equality and Diversity and unconscious bias;
- ✓ Roll out sector specific training relating to the Construction and Healthcare, to nominated employees of those sectors to provide support at a local level to the central compliance team to ensure additional processes to be incorporate into our Modern Slavery policies and procedures across these divisions are done so with the full support of local teams;
- ✓ Continue to establish relationships with anti-slavery organisations / charities to further strengthen The Company's knowledge, exposure and continued education on the topic and strategy of tackling modern slavery;
- ∞ Review our supplier due diligence process and audit process, implementing any additional processes as identified within the review;
- ∞ Host Modern Slavery seminars for clients to increase awareness and strengthen the safety of workplaces to which our workers are supplied;
- ✓ Circulate mailers about How to become a Stronger Together Business Partner to all Low Risk Suppliers within our supply chain to increase knowledge and awareness at this level;
- ∞ Launch our *Modern Slavery Client Collaboration Strategy* with key clients. A programme which seeks to cross reference 'common details' of clients directly employed worker records with our temporary worker records. This process will ensure modern slavery alerts from common details checks are maximised compared to each organisation completing their own in isolation. Significant work has gone into establishing how this can be achieved without any risk of breaching GDPR, we are hopeful clients will embrace this collaboration strategy.

## 2024 KEY STATS



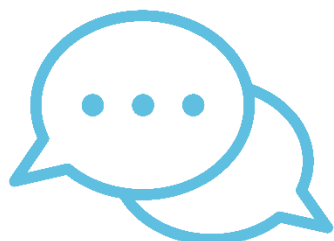
*Assisted two clients to develop a supplier due diligence process. Which resulted in one client removing two suppliers from their supply chain*



*Circulated mailers on How to become a Stronger Together Business Partner to 300 low risk suppliers within our supply chain*



*PIWA & Ethical Compliance Manager completed two external training courses for modern slavery in the construction sector*



*Completed in excess of 30,000 Stronger Together based interviews and submitted in excess of 35,000 Stronger Together questionnaires with live workers*



*Reported 110 imposters to UKVI identified at the point of application*



*Reported 3 suspected cases of modern slavery to the GLAA and supported the GLAA with 1 investigation*

## CASE STUDIES

### CASE STUDY 1 – Investment in technology to strengthen compliance and reduce the risk of modern slavery in our onboarding

The Company has made a strategic investment in technology to reinforce our compliance processes and help prevent modern slavery within our supply chain. Central to this initiative has been the development and implementation of a bespoke Compliance Registration System (CRS), designed not only to reduce administrative burden but also to proactively identify risks related to fraud and modern slavery at the point of candidate onboarding.

A cornerstone of this system is the integration of advanced identity verification technologies. Following the UK government's introduction of Identity Document Validation Technology (IDVT), The Company worked with approved suppliers to implement this into our CRS. We then enhanced the facial recognition match element of the technology to strengthen all of our onboarding and right to work check processes, not just those being undertaken by the IDVT.

This additional safeguard has delivered significant results: over the last 12-months 110 imposters were detected and prevented from entering our workforce. Often imposters are, or more subject to becoming, victims of modern slavery as without their own right to work they are forced to utilise someone else's potentially incurring payment for use of the document and/or from the work they gain access to. These interceptions are a clear demonstration of how technology can play a critical role in disrupting potential modern slavery networks, where the use of false identities is a known tactic.

Beyond identity verification, our CRS includes a bank account verification tool that cross-checks account details against the candidate's provided address. This step adds another layer of due diligence, helping to detect inconsistencies that may signal financial coercion or fraudulent arrangements. With manual interceptions or reviews by our Compliance team where escalations are raised.

To extend the reach and effectiveness of these compliance tools, The Company is now scoping further enhancements to integrate our CRS with our Customer Relationship Management (CRM) platform via a two-way Application Programming Interface (API). This planned integration will facilitate real-time cross-system data checks and introduce dynamic interview questioning – functionality that was not feasible during the initial phase. These additions will further support the early identification of individuals at risk of exploitation, triggering automated escalations for review by our compliance specialists.

This investment in automation and smart technology is transforming our compliance function from a retrospective auditing process into a proactive, preventative system. Real-time alerts and data-driven insights are enabling us to address potential issues before individuals enter the workforce. Looking ahead, The Company remains committed to expanding our use of technology specifically to prevent all forms of fraud, including those that may facilitate or mask modern slavery practices.

#### **CASE STUDY 2 – Strengthening supply chain compliance for our clients**

In 2024, The Company was appointed as the master vendor for a high-volume, fast-paced logistics organisation operating in the direct-to-consumer space. With daily workforce needs ranging from 100 to 200 staff across shifts – including warehouse operatives, MHE drivers, and administrative support – the client had previously engaged multiple recruitment providers to meet fluctuating demand.

However, the client had identified concerns within their labour supply chain, prompting them to prioritise working with a recruitment partner who could provide not only agility and scale, but also the highest levels of ethical and legislative compliance. Their objective was clear: to ensure that all workers were sourced through a transparent, fully compliant process, free from the risks of exploitation or unethical labour practices.

As part of our mobilisation, The Company undertook thorough due diligence on all existing recruitment suppliers to assess their suitability for inclusion on our Preferred Supplier List (PSL). This began with a comprehensive review of publicly available information, including Companies House records, where we identified a number of red flags relating to one of the main incumbent suppliers (Agency A). These included:

- A history of setting up and dissolving numerous recruitment businesses over a ten-year period, often followed by insolvency proceedings.
- A similar pattern observed with linked outsourced payroll companies, all associated with the same directors.
- A website promoting umbrella-style payroll models, deemed likely to be non-compliant for the types of roles and rates in question, therefore raising serious concerns around fair pay and tax treatment for workers.

Additional concerns were highlighted by survey, the outcomes of which further indicated employment intermediary usage and associated risks of unpaid pension contributions, holiday pay claims, and potential liability for unlawful deductions. One response suggested that they were not directly employed or paid through a legitimate PAYE process, and as a result had their visa renewal cancelled due to insufficient National Insurance contributions – highlighting a significant risk of labour exploitation.

We met with the client to present our findings and recommended which providers could remain in the supply chain under our master vendor supply model, and which posed unacceptable risks. The Company under TUPE (Transfer of Undertakings Protection of Employment) regulations. Our proposal included a detailed overview of the risks, including potential contractual liabilities, and a clear transfer and compliance plan designed to mitigate any disruption to the workforce and safeguard all parties involved.

During the transfer process, further concerns were validated. When we requested Employee Liability Information and employment contracts, Agency A provided an example contract which we found to be materially non-compliant. The contract included several inaccuracies, such as:

- Incorrect holiday year details that did not align with the submitted worker information.
- A mismatch in stated payment frequency – monthly in the contract versus weekly in practice.
- Promised benefits such as bonus schemes and profit-sharing arrangements that had no record of implementation.

Throughout the transfer, The Company held transparent consultation briefings with all workers, clearly explaining their rights, the terms of our contracts, and all associated legislative entitlements such as holiday pay and pension contributions. Where valid Right to Work documentation could not be established, either due to gaps in the original onboarding or workers' inability to provide appropriate documentation, transfers could not be completed.

Despite these challenges, we successfully transferred over 90% of the affected workforce. The client now has full confidence in the integrity of their labour supply chain, with complete visibility over worker engagement, and has commended The Company for the ethical rigour, operational efficiency, and risk mitigation demonstrated throughout the process.

## 2025 – 2026 MODERN SLAVERY OBJECTIVES

The below are The Company objectives for 2025 – 2026 financial year. These are objectives over and above our standard company commitments, which demonstrate our ICARE values and desire to further strengthen our approach to tackling Modern Slavery:

1. Continued investment into further development of our Candidate Registration System (CRS). Implementing the dynamic interview questioning which could not be achieved for the initial implementation to enhance the current mechanisms in place to identify potential modern slavery victims during the onboarding process.
2. To review our operational network locations against Modern Slavery hotspots to support strategic determination of areas in need of additional training and/or audit measures being implemented.
3. Appoint a Modern Slavery Champion under the S2G advanced Business Partner Commitments who will be responsible for providing additional training to staff in those areas determined as hotspots and host a quarterly meeting to discuss any issues, any concerns, any local intelligence or knowledge that should be shared.
4. Host 3 Modern Slavery Seminars in support of Anti-Slavery week. These will be made available for our existing and prospect clients as well as our High-Risk suppliers to increase awareness and strengthen the safety of workplaces to which our workers are supplied as well as placing a spotlight on our chosen Modern Slavery charities and organisations.
5. Complete a minimum of 12 volunteer days for our chosen anti-slavery organisations / charities across the UK.
6. Launch our Modern slavery Supplier Collaboration Strategy with High-Risk Suppliers. A programme which seeks to cross reference 'common details' of High-Risk Suppliers worker records with our temporary worker records. This process will ensure modern slavery alerts from common details checks are maximised compared to each organisation completing their own in isolation. Significant work has gone into establishing how this can be achieved without any risk of breaching GDPR, we are hopeful clients will embrace this collaboration strategy.

## OVERVIEW

As a responsible corporate business, The Company aim to act in a socially responsible manner at all times, by respecting the economic, social, cultural, political and civil rights of those employed through our business, and by complying with human rights legislation and the Modern Slavery Act 2015. Since the publication of our previous Modern Slavery statements, The Company internal Compliance Team have made several changes to their training, systems, audits and standard business practices which have strengthened our operational understanding, awareness and process relating to modern slavery. Additionally, they have developed links with various external bodies and government authorities to ensure industry issues including illegal working prevention and labour exploitation are effectively managed and escalated where required.

We are proud upon publication of our 2025 statement to be able to demonstrate the effectiveness of the processes we have introduced into our business in relation to tackling modern slavery, human trafficking and forced labour exploitation. The successful identification of several cases of potential exploitation reinforces the dedication and commitment of our teams to tackling modern slavery. As a business, we are committed to continuous improvement and strive to identify new methods, processes and practices that can be incorporated into our business operations, ensuring the health, safety and welfare of our workforce. The commitment is demonstrated by the significant financial investment made towards the development of our Candidate Registration System, for which we have more plans and investment allocated to further develop features which aim to identify and prevent modern slavery risks within our business.

The Compliance Team having established thorough policies and processes which have demonstrated consistently high results and positive acknowledgment from our workers, clients, association bodies, achieving winning status of national industry awards are now seeking to implement objectives and strategies which will produce tangible, positive impacts on the prevention of Modern Slavery across our client and supplier network, as well as introducing measured charitable initiatives which will have a direct benefit to the society in which we live and work and help to ensure victims of modern slavery can develop their confidence and experience healthy, positive workplace and employment.



**Mark Roberts**  
Managing Director  
01/07/2025

## MODERN SLAVERY POLICY STATEMENT – VERSION 8 – 01.07.2025