

Modern Slavery Statement 2023

Policy Statement

Major Recruitment Ltd and its subsidiaries within The Major Group have a zero tolerance to modern slavery. The Major Group commits to developing and adopting a proactive approach to tackling hidden labour exploitation throughout the supply chain in which it operates. The following statement focuses on complying with the Modern Slavery Act (2015) ensuring visibility on the steps The Major Group take in removing modern slavery in our supply chain.

Modern Slavery is the act of depriving an individual of their liberty for financial gain. This can include Forced Labour, Human Trafficking, Wage Theft, Work Finding Fees or Bribes and Rogue Landlords. The Major Group aim to eliminate all forms of Modern Slavery within our supply chain with the use of company policies, training and working with regulatory bodies such as Stronger Together, GLAA, ALP & SEDEX.

Organisation Structure

This policy applies to all locations within Major Recruitment Ltd, Key Selection Ltd, Key Selection Investments Ltd & Key Selection Recruitment Ltd, otherwise known as 'The Major Group'. The Major Group operate in various specialist sectors including:

Accounts & Finance	Animal Health & Nutrition	Agriculture
Automotive	Construction & Property	Contact Centre
Education	Energy	Engineering
Executive	Health & Social Care	Life Sciences
Manufacturing	Office Services	Sales & Marketing
Supply Chain & Procurement	Telecoms	Warehousing & Logistics

We have assessed our business and identified particular risks of forced labour within, but not limited to, Agriculture, Health & Social Care, Supply Chain & Procurement and Warehousing & Logistics. With this in mind we have adopted the measures below in order to identify and prevent any form of Modern Slavery within these sectors.

Our Modern Slavery Statement and our Preventing Hidden Labour Exploitation Policy applies to all members of staff employed by The Major Group and anyone working on our behalf.

Major Recruitment Group are a Stronger Together Advanced Business Partner and the following staff members have attended the training;

- Jess Standing – Admin & Compliance Manager
- Katie Nebard – Group Managing Director – Business Partner
- Will Bottomley – Systems and Project Executive
- Dawn Howe – Head of People & Culture
- Jo Lofts – Director

Major Recruitment Group commit to at least 2 relevant employees attending the training every 12 months.

Our Policies

The Major Group are committed in implementing effective strategies and procedures in removing Modern Slavery from our supply chain. One way we enforce this is through our Hidden Labour Exploitation Policy. The Major Group prides itself on trading ethically within the market; the following group policies shape the companies practices in ensuring ethical business:

- Ethical Policy
- Anti-Bribery Policy
- Equal Opportunities, Trust, Dignity & Respect Policy
- Working Young People Policy
- Temporary Workers; conduct Regulations and Working Time
- Environmental, Corporate & Social Responsibility Policy

Our board of Directors ensure all company policies are upheld by every member of staff and comply with our ethical and legal obligations. These company policies are available from the S Drive.

The Major Group conduct strict right to work checks to ensure all candidates are compliant and eligible to work. This includes ensuring onsite identity documents match the candidate, video calling, onsite worker check-ins. All employees must evidence that they matched the original. Our CRM system operates a Compliance Screening module, which prevents workers with non-compliant records being booked onto an assignment.

Our Central Services Team run monthly checks to ascertain duplicate bank accounts and proof of address checks to flag up any 'patterns' which may indicate Gangmaster activity.

Where potential activity is highlighted, the Senior Management Team must be notified and provided the report. The SMT will instruct the People & Culture Team to carry out an investigation, including worker interviews and confidential surveys. Where necessary an interpreter must be arranged to support.

In the event Gangmaster activity is identified we will collaborate with the Gangmasters and Labour Abuse Authority (GLAA) to collectively find a solution and share our knowledge.

Branches have access to support systems, such as our dedicated Group Compliance Manager who conducts regular and thorough audits and our People & Culture team who run regular courses on the Stronger Together principles.

All employees are issued an Employee Handbook which outlines company procedures and processes in tackling Modern Slavery; this is revised and reissued annually.

Training

Employees are taken through training to ensure they are aware of Modern Slavery and Hidden Labour Exploitation, their responsibilities within their role and steps to take to prevent the practices. The need for thorough recruitment practices is highlighted throughout training sessions, including compliance training, as many of these are ways in which to protect their candidates. Employees are also made aware of steps to take should they have any suspicions, which includes an escalation process to People & Culture and/or Senior Management and, where the temporary worker has been working for one of the Group's clients, discussions with the HR Team or relevant contact on that site.

Contact numbers for relevant support mechanisms (e.g. Modern Slavery Helpline, GLAA and the Police) are available within the training materials, as well as on posters in our branches which are visible to candidates and clients who may visit that site, as well as acting as an ongoing reminder and engagement tool for employees.

The Major Group run compliance training for employees on a regular basis to ensure awareness and inspection in day to day practice. Regular sessions allow for our trainers to pass on new legislation and internal policy changes

Policy Commitments

Major Recruitment Ltd and subsidiary companies shall:

1. Designate the People & Culture team to train consultants / managers on “Tackling Hidden Labour Exploitation” and to have responsibility along with Compliance for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost, (paid by clients) and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and signs to look for.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent employees.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
6. Provide information on tackling “Hidden Labour Exploitation” to our workforce and others through training, processes and visible posters in the workplace displaying helplines.
7. Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities. Provide posters will helpline numbers.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Policy Implementation

- a. All staff receive Stronger Together training as part of their Induction within their first month of employment
- b. A record of this training record shall be held on the company Training Record, as well as on the employee’s HR file
- c. There will be 4 key representatives in the company at all times who have attended training with Stronger Together within the last 2 years

Definitions:

- 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.
- 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

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

Major Recruitment memberships;

- **GangMasters Licencing Abuse Authority**
- **Sedex**
- **Association of Labour Providers**
- **Stronger Together**

If you have any further questions, please contact the People & Culture team on HROperations@major-recruitment.com.

Dawn Howe

Date: May 2023

Date of Next Review: May 2024