

## **MODERN SLAVERY POLICY AND STATEMENT**

Buckingham Recruitment Ltd (the Company) is a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003. This policy applies to all directors, employees and consultants henceforth referred to as Staff of the Company and those of its associated entities.

### **1. INTRODUCTION AND POLICY STATEMENT**

1.1. The Company has a zero tolerance policy towards modern slavery, whose forms are crimes and violations of fundamental human rights. The Company is committed to acting ethically and with integrity in all business dealings and relationships. We have in place effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or supply chains.

1.2. Modern slavery takes various forms, including:

1.2.1 slavery

1.2.2 servitude

1.2.3 forced and compulsory labour

1.2.4 human trafficking.

The above forms of slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.3. The Company is committed to ensuring there is a transparency in our own business and in our approach to preventing modern slavery throughout our supply chains, consistent with our own principles for sustainable business.

1.4. The Company is not required to make an annual Modern Slavery Statement due to its turnover being under £36M per annum. The Company has voluntarily elected to put this policy in place as its own Statement.

### **2. APPLICATION**

2.1. This policy applies to all Staff working for or on behalf of The Company in any capacity, including all employees, consultants, agency workers, individuals undertaking work experience, contractors, third-party representatives and business partners.

#### **The Supply Chain**

2.2. The Company expects all of its contractors, consultants, suppliers and other business partners to adopt the same high standards in the pursuit to prevent modern slavery. As part of our procurement and contracting processes, The Company expects Suppliers to ensure compliance with the Act and our own policy against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

2.3. The arrangements that the Company has entered into with all partners, consultants, contractors and suppliers, have been entered into freely and voluntarily by both sides in each case, with agreed terms and conditions. All contractual arrangements can be terminated on notice according to the individual contract.

2.4. The Company expects our suppliers to adopt the same principles when contracting their own suppliers.

### **Employee Terms and Conditions**

- 2.5. The Company ensures compliance with all applicable employment legislation relating to recruitment and employee terms and conditions, including ensuring that right to work checks are properly carried out, and that no staff in the UK are paid less than the National Minimum Wage. Employment is not subject to any requirement to hand original documents such as passports into the Company for the duration of the Employment. Employment can be terminated by either party in the usual ways, as detailed in the employment contract.

### **3. RESPONSIBILITY FOR THE POLICY**

- 3.1. The Managing Director has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations and that all Staff comply with the policy.
- 3.2. The Managing Director has primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness.

### **4. COMPLIANCE WITH THE POLICY**

- 4.1. All Staff are required to read, understand and comply with this Policy.
- 4.2. The prevention, detection and reporting of modern slavery in any part of The Company's business or supply chain is the responsibility of all Staff. All members of Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3. In the event of an actual, suspected or potential breach of this Policy, within the business itself or its supply chain, you should contact the Managing Director.
- 4.4. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any forms of modern slavery, you should seek guidance from the Managing Director.
- 4.5. 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 as a result of reporting in good faith their suspicion that modern slavery, of whatever form, is or may be taking place in any part of the Company's business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

### **5. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 5.1. This Statement and Policy will be made available for all staff both on our internal OneDrive and external company website; in order to increase awareness and understanding of Anti-Slavery and Human Trafficking legislation and the responsibilities of Staff.
- 5.2. The Company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **6. BREACHES OF THIS POLICY**

Failure to comply with this policy and/or associated regulations, may lead to disciplinary action including, in certain circumstances, dismissal. The Company reserves the right to amend this policy as required.