

The Recruit Venture Group

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create

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This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that The Recruit Venture Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

This statement is made by The Recruit Venture Group on its own behalf and also on behalf of the following companies: Jark Ventures Plc, Recruit Ventures Limited, Jark Industrial Limited and Paytemp Limited

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. All companies in the group have a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

The Recruit Venture Group, Recruit Ventures and Jark Ventures are intermediate holding companies, providing financial assistance, and back office administrative functions and therefore are in themselves low risk businesses.

The companies within the group of companies are all recruitment companies and therefore deemed to be high risk.

Consequently we therefore expect our business partners to work compliantly and ethically at all times. These organisations have in turn created voluntary statements regarding their approach to modern slavery. They provide staff to a wide range of clients many who have signed up to the Ethical Trading Initiative and / or are within the regulated sectors covered by the Gangmasters and Labour Abuse Authority.

Our high risk areas

The overall nature of our businesses means that our group companies need to remain diligent at all times in order to eradicate opportunities for potential traffickers to gain access to their business. We are fully aware of the potentially high risk in that they may be targeted by unlicensed gangmasters. With this in mind we demand that our group companies train their staff to be aware of the likely signs of modern slavery and bonded labour and to be alert for any signs of exploitation within the recruitment and supply of temporary labour.

Our policies

Each company operates a number of internal policies to ensure that business is conducted in an ethical and transparent manner. These include:

- 1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- 2. Ethical Trading Policy. Operating within a strict framework regarding treating people with respect and within statutory guidelines.
- 3. Recruitment policy. Robust recruitment policies, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- 4. Bank account policy. To prevent workers being exploited by another individual or potential trafficker there are strict policies and internal procedures regarding individuals only being paid into their own bank accounts or of an obvious family member and only two people per account. This is monitored to ensure adherence to the policy
- 5. All temporary workers are clearly advised that they cannot be charged for work services and asked to alert us if they have been charged.
- 6. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns, or practices within our business or supply chain, without fear of reprisals.
- 7. Information is clearly displayed within offices regarding the risks of modern slavery and the message of the "Stronger together" principles.
- 8. Adherence to the Gangmaster Licensing and Abuse Authority standards across the whole business not just within the regulated sectors.
- 9. Regular compliance inspections to review processes and procedures, identify areas of concern and advise on good practice
- 10. Proactivity in terms of notifying the relevant authorities if anything causes concern

Our suppliers

We are currently working on evolving our supply chain compliance programme to include due diligence on our suppliers and potential suppliers to further ensure that those suppliers are not using slave or trafficked labour and understand the requirements of the Modern Slavery Act 2015.

Our Clients

Our group companies work with clients in order to ensure that there is a transparency within the supply chain and to ensure that our client's businesses are protected.

<u>Training</u>

All our internal staff receive training, either internal and or external, along with regular updates to ensure they understand their obligations towards the eradication of Modern Slavery and are taught to spot the signs of potential exploitation and to raise their concerns to Senior Management and the appropriate authorities

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

• No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 24th January 2019

Name: Paul Mizen

Signature: Para

Date: 24th January 2019