Modern Slavery Act Policy

Policy

BE Recruitment Ltd is committed to preventing modern slavery and human trafficking in all aspects of our business operations and supply chains. We maintain a zero-tolerance approach and expect all employees, suppliers, and partners to uphold the highest standards of ethics and compliance in line with this commitment.

Modern slavery is a violation of fundamental human rights and includes slavery, servitude, forced and compulsory labour, bonded and child labour, and human trafficking. We recognise our responsibility to take a proactive and risk-based approach to ensure that modern slavery does not exist within our operations or those of our suppliers.

Scope

This policy applies to all individuals working for or on behalf of BE Recruitment Ltd, in any capacity, including:

- Employees at all levels
- Directors and officers
- Agency workers and seconded staff
- Volunteers and interns
- Contractors, agents, and consultants
- Suppliers and their subcontractors

Our Commitments

BE Recruitment Ltd is committed to:

- Maintaining a zero-tolerance approach to modern slavery across our organisation and supply chains.
- Implementing and maintaining systems and controls designed to identify and prevent modern slavery risks.
- Holding all stakeholders and partners accountable to the same high ethical standards, including requiring our suppliers to do the same with their supply chains.
- Continuously improving our due diligence, risk assessment, and contract management processes to address potential risks related to forced labour and exploitation.
- Protecting vulnerable workers and ensuring access to safe reporting mechanisms. Individuals who raise concerns in good faith will not suffer retaliation, detriment, or victimisation. Where instances of modern slavery or labour exploitation are identified, appropriate support and remediation will be provided to affected individuals.

Responsibilities

- All individuals working for or on behalf of BE Recruitment Ltd are responsible for preventing, identifying, and reporting any concerns related to modern slavery.
- Employees must not engage in, facilitate, or ignore any activity that could lead to a breach of this policy.
- Managers are responsible for ensuring their teams understand the policy and act in accordance with its principles.

Risk-Based Approach

We adopt a risk-based approach to managing modern slavery risk in our contracting and supplier relationships, including:

- Assessing whether specific clauses prohibiting modern slavery are required in contracts.
- Evaluating whether suppliers should be required to sign up to our Code of Conduct, which outlines minimum standards to prevent labour exploitation and trafficking.
- Where appropriate, requesting that suppliers using third-party labour obtain compliance commitments from those third parties.
- Considering whether audits of suppliers are warranted as part of our due diligence process.

Addressing Non-Compliance

If we identify a breach of this policy by an individual or organisation working on our behalf, we will take proportionate and appropriate action, which may include:

- Requiring the party to remediate the breach where possible, prioritising the protection and welfare of any individuals affected.
- Terminating the relationship with any party found to be knowingly involved in modern slavery or human trafficking.

Continuous Improvement

BE Recruitment Ltd is committed to continuously improving its approach to tackling modern slavery. This includes:

- Engaging with stakeholders and suppliers
- Reviewing our systems and processes annually
- Providing training and awareness to our teams
- Displaying visible helpline information in workplaces where relevant
- Promoting a culture of transparency, ethics, and accountability

For any concerns or to report suspected modern slavery, please contact the Compliance Team or a member of senior management. Alternatively call the Modern Slavery helpline on 08000 121 700.

Monitoring and Review

This policy will be reviewed annually or sooner in response to legal or operational changes.

Document Control and Accountability

- Review date: 24/08/2027
- Approved by: Lisa Ridley, Company Secretary
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