

# **Modern Slavery Policy**

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### 1. Background

The Modern Slavery Act 2015 (the Act) significantly enhanced the criminal penalties for traffickers and illegal gangmasters, alongside increasing support and protection for victims of modern slavery and human trafficking. The Act applies across all industry sectors and so is not recruitment specific.

Section 54 of the Act also introduced a new statutory obligation on large businesses to publish an annual statement on the steps they are taking to ensure that modern slavery and human trafficking are not taking place within their business operations and their supply chain. The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 which came into effect on 29 October 2015 build on Section 54 and provide more detail on the requirements. All references to the Regulations in this document are to those regulations.

### 2. What do slavery, human trafficking and exploitation mean?

- Slavery/ servitude behaviour depriving an individual of their freedom and property.
- Human trafficking arranging or facilitating the travel of another person with a view to them being exploited, even if they consent to the travel.
- Exploitation- forced or compulsory labour. This can include direct threats of violence or more subtle forms of compulsion.

### 3. Overview

Slavery, child labour and human trafficking are serious crimes and a violation of fundamental human rights. There are various forms of this 'Modern Slavery' which deprives victims of their liberty and usually involves financial exploitation.

At Hampton's Resourcing Ltd we conduct our business fairly, ethically and with respect to fundamental human rights. We are fully committed to the prevention of all forms of slavery, forced labour or servitude, child labour and human-trafficking, both in our business and in our supply chains. We will not tolerate it.

This policy does not form part of your contract of employment, and we reserve the right to amend this policy at any time.

You are required to read and comply with this policy if you work for, or on behalf of the Company in any capacity including as: an employee, director, officer, agency worker, consultant, volunteer, supplier or service provider.

The Company's Anti-Slavery Officer, Simon Ray ('ASO') is responsible for this policy.

Hampton's Resourcing Limited Registered Company Number: 8439682 Registered Office Address: Comer Oak, 1 Homer Road, Solihull, B91 3QG Office Number: 01926 353 999



Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and the Company. It could also involve other legal steps being taken against you.

### 4. Preventing slavery and human-trafficking in our business

Our supply chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains. This is due to our suppliers being Uk based and strict processes we have in place. It is also due to the nature of our sector in which we recruit.

The Company makes appropriate checks on all employees, umbrella companies and suppliers, to know who is working for, or on behalf of us. This includes using the below methods:

- Right to work documentation processed through an approved IDSP.
- Face to face checks where possible
- Video checks where required
- Enhanced DBS checks and referencing checks following strict audit requirements.
- Regular compliance checks for all of our umbrella suppliers, including tax avoidance list checks, relevant company information and accreditations. Any suppliers found to breach our terms will be removed from our approved list and reported.
- We provide every employee with a written contract of employment including all the relevant contractual information and requirements for each placement.
- We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

If you breach this policy or are found to have slavery or human-trafficking in your business, or knowingly in your supply chain, the Company may terminate the contract with you and pursue its legal remedies against you.

## 5. Embedding the principles

We will continue to embed the principles through:

- Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensuring staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK.
- Ensuring that consideration of the modern slavery risks and prevention are added to Hampton's policy review process as an employer and procurer of goods and services.
- Continuing to take action to embed a zero tolerance policy towards modern slavery.
- Ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

This statement has been approved by Simon Ray, Hampton's CEO, for the financial year ending 25<sup>th</sup> August 2025.

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