

## Modern Anti-Slavery Policy

Skill Step Group are committed to adopting a proactive approach to tackling hidden labour exploitation and will not tolerate any form of labour exploitation of our workers or colleagues. Exploitation can include forced labour and human trafficking, including asylum seekers and immigrants for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation.

Not everyone sees themselves as a victim, or they may be reluctant to come forward and subsequently the act of exploitation can be well hidden. In this respect we will ensure that the Management Team are fully aware of the requirements of the Modern Slavery Act 2015, the International Labour Organisation's core conventions & UN Global Compact and be vigilant in enforcing compliance.

Skill Step Group Ltd are committed to;

- Legal compliance
- Raising awareness of modern slavery issues including how to spot the signs in the business and supply chain
- Having provision(s) for whistleblowing or other mechanism(s) for reporting issues
- Having a nominated person at the most senior management level within the business that has responsibility for preventing modern slavery within the business
- Applying and communicating this policy within the business and our supply chain
- Addressing and directly prohibiting practices that are known to contribute to the risk of modern slavery

- Applying due diligence requirements for the business and supply chain and having steps in place should modern slavery practices be identified within either
- The identification of and management requirements for any high-risk materials/labour sourcing.

In support of this policy the Skill Step Group will:

- Designate appropriate Managers to attend training and to have responsibility for development and operating company procedures that support this policy
  - Regularly monitor our activities and identify potential risk areas in our business and supply chain
  - Ensure that job finding fees are absorbed by the company and will under no circumstances allow these to be paid by job applicants
  - Not use any individual or organisation to source and supply workers without confirming first that that workers are not being charged a work finding fee
  - Ensure that all staff responsible for directly recruiting workers are aware of issues around third party exploitation and that they are well informed of the signs to look for
  - Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members
  - Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the police and any relevant regulating bodies
  - Communicate information on tackling “Hidden Labour Exploitation” to our workforce through our briefings and communications
  - Encourage employees and agency workers to report cases of hidden third-party labour exploitation and provide a confidential means to do so
  - Protect whistle blowers through our confidential reporting process
  - Investigate and act on reports in a timely and appropriate manner
  - Work with the police in dealing with any complaints and provide access to documentation where required
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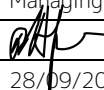
- Require other organisations in the labour supply chain to adopt policies and procedures in adherence with the Modern Slavery Act, International Labour Organisation's core conventions & UN Global Compact

This policy will be communicated to all staff, made available to our clients, suppliers and associates on request and regularly reviewed for effectiveness.

Revision Status

Revision	Date	Amendment	Content Owner	Mandated By
1.0	17/09/2020	Issued for use	K Hodgson	K Hodgson
2.0	26/10/2021	Annual Review- minor changes to reflect organisational structure changes	H Kirkham	K Hodgson
3.0	16/10/2022	Annual Review- minor changes to reflect organisational structure changes	K Hodgson	K Hodgson
4.0	10/10/2023	Annual Review- SSG commitments added	K Hodgson	K Hodgson
5.0	30/09/2024	Annual Review- new logo added. Content owner and mandated by changed.	P Hodgson	P Hodgson

Approval

Approved by:	Paul Hodgson
Job title:	Managing Director
Signature:	
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