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| Company Name: | Wellingtone Project Recruitment |
| Model Policy No. | WPR – MSP-16 |
| Model Policy Name: | Modern Slavery Policy |
| Date: | 06/06/2015 |
| Version: | 1.1 |

1. Wellingtone Project Recruitment is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Wellingtone Project Recruitment is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Wellingtone Project Recruitment provides appropriate training and awareness information for all of its staff. In particular:
 - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to The Head of Recruitment.
5. Reports surrounding these issues are taken extremely seriously by our Managing Directors and senior leadership team, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - Working with the appropriate organisations to improve standards,
 - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
 - The level of modern slavery training and awareness amongst our staff.
7. We would also recommend reading this in conjunction with our other policies, including our:
 - Corporate social responsibility policy
 - Anti-bribery / corruption policy, and Whistle-blowing policy.

This policy was adopted on 6th of May 2013 after being agreed by our Directors.

Modern Slavery Statement

This statement is made as part of Wellingtone Project Recruitment's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Wellingtone Project Recruitment operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

Gordon Dewar-Mckay
Head of Recruitment

1 Our Business

Wellingtone Project Recruitment is a limited company operating in the recruitment sector. We provide introduction services in the Professional Services space. Wellingtone Project Recruitment is an independent business.

1.1 Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies. We do not supply work-seekers to hiring companies through any intermediaries. Some of our work-seekers are supplied via other businesses, who facilitate providing them to the eventual hiring company. **1.2 Other relationships**

As part of our business, we also work with the following organisations:

- sector-specific professional and regulatory bodies
- sector-specific industry bodies
- the Recruitment and Employment Confederation (www.rec.uk.com) and the Institute of Recruitment Professionals (www.rec-irp.uk.com)

2 Our Policies

Wellingtone Project Recruitment has a modern slavery policy. **Policy development and review**

Wellingtone Project Recruitment's policies are established by our Directors based on advice from, industry best practice and legal advice, and in consultation with the Head of Recruitment. We review our policies on a regular basis.

3 Our Processes for Managing Risk

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

We conduct audits before entering into a commercial relationship with any business where there is the potential for risk.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We work with REC in order to combat the risk of modern slavery and human trafficking.

Our staff are encouraged to bring any concerns they have to the attention of management.

4 Our Training

All of our staff receive training and support that is appropriate to their role. In particular:

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters, undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.