

## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY 2018-2019**

The Berry Recruitment Group and its subsidiaries (“the Company”) maintains relationships with many different organisations in its supply chain, as well as supplying varying levels of contract, interim, temporary and permanent workers. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine what existing measures are undertaken and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or supply chain.

The Company has adopted a statement of our corporate values on the prevention of modern slavery and human trafficking. This value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with the Company and/or any member of the Company, to familiarise themselves with, and act at all times in a way which is consistent with, our anti-slavery values.

### **BERRY RECRUITMENT GROUP ANTI-SLAVERY VALUES**

As part of our culture of good governance for good business, the Company operates to a set of core values which reflect our relationships with our customers, shareholders, suppliers and team members. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

### **PURPOSE OF THIS POLICY**

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which deprive an individual of their liberty as other persons exploit them for personal or commercial gain. This document sets out the policy of the Company with the aim of the prevention of opportunities for modern slavery to occur within our businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

The Company operates a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or those of our suppliers.

## **STEPS FOR THE PREVENTION OF MODERN SLAVERY**

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract and confirmation of this forms part of our company induction process.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

- (i) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- (ii) engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- (iii) where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- (iv) introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

## **RESPONSIBILITY FOR THE POLICY**

Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

## **ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING**

Whistleblowing Procedure — direct access to senior leadership

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner.

In summary, a team member should approach a company director with the nature of the concern who will determine the company's next course of action.

### **Confidential Feedback Line**

Those who are accessing this policy because they:—

- are seeking a business relationship with us/our businesses or
- already have a business relationship with us/our businesses

are also advised to familiarise themselves with the main features of our measures for combating modern slavery: Suspicious Activity Confidential Line 01727 589056.

This line may be accessed by employees or any other person wishing to raise a concern. You should call this line in any of the following circumstances:—

- You suspect a person acting on behalf of Berry Recruitment Group is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of Berry Recruitment Group who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of Berry Recruitment Group or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports to the Suspicious Activity Confidential line ("the Line") are kept in confidence, subject to the need for the Company to act responsibly and within the law. The source of reports to the Line will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed on our behalf or in any element of our supply chain.

### **Direct communication**

The Company encourages members of the public or people not employed by us to email in confidence, to a Company Director at [info@berryrecruitment.co.uk](mailto:info@berryrecruitment.co.uk) to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

## **SAFEGUARDS**

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

## **COMMUNICATION AND AWARENESS OF THIS POLICY**

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **REVIEW**

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published no later than the publication of our 2018 financial results.

Recommended for adoption by the Board

Date of Adoption: 1 January 2017

Next Review: 1 January 2020