



A N T I - S L A V E R Y & H U M A N T R A F F I C K I N G P O L I C Y

Last Revised: 1st March 2020

Financial Careers Ltd maintains relationships with 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 during the financial year ending 26th April 2021.

Financial Careers Ltd has adopted a statement of its corporate values on the prevention of modern slavery and human trafficking. This value statement governs its business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. As part of our culture of good governance for good business, Financial Careers Ltd conducts its business in line with a set of core values which are reflected in our relationships with customers, stakeholders, suppliers and team members.

All our business relationships, our processes and our procedures are built on foundations of ethics and integrity, which is reflected in our zero-tolerance approach to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015.

We are therefore 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.

P U R P O S E O F T H I S P O L I C Y

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 Financial Careers Ltd (the "Company") with the aim of the prevention of opportunities for people linked to our business to be treated as

commodities, to occur within its businesses or supply chain. For the avoidance of doubt, this policy's use of the term "modern slavery" has the same meaning given in the Act.

As a recruitment and staffing business operating in the UK and overseas, we recognise that we may have a greater responsibility than most to establish appropriate methods of assessing, preventing and mitigating risk of modern slavery occurring in their supply chains and organisation.

We operate 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.

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. However, we have a suite of Company policies (including Business Ethics, Corporate Social Responsibility, Code of Conduct, Discipline and Grievance and Whistleblowing Policy) that define what is acceptable and expected in terms of behaviour in our Company, and all our employees are managed within these parameters.

This approach is reflected in the management of the supplier relationships too. 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.

To underpin our compliance with practical steps, we intend to implement the following measures:

S U P P L I E R R E L A T I O N S H I P S A N D S U P P L Y C H A I N
I N G E N E R A L

1. conduct and review all risk assessments annually 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;
2. aim to build long lasting business relationships with reputable suppliers, contractors and sub contractors
3. at point of engagement with any new suppliers and during quarterly/annual reviews, convey our position regarding Anti-Slavery either as an introduction or as a reminder, and gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
4. 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;
5. 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.
6. inform and gain agreement from all suppliers that we expect all members of our supply chain to at least adopt a ‘one up’ due diligence approach on the next link in the chain

I N T E R N A L O P E R A T I O N S – T R A I N I N G ,
P R O C E S S E S A N D C O M P L I A N C E

1. All prospective employees will be interviewed against a set of core competencies that we deem to be inextricably linked to our organisations core values. Once hired, adherence to Company expectations in terms of conduct, behaviour and performance forms part of all team members’ obligations under their contract of employment.
2. At point of hiring, all new employees will be referenced (wherever possible) and will undergo a Company induction and on the job training which will outline the processes and procedures
3. All processes and procedures related to recruitment service provision (both internal and external) will be defined in such a way as to mitigate the risk of modern slavery occurring. These processes will include (but will not be limited to) Right to Work Checks, provision of certain personal information before starting work

4. A 'Compliance Team' will be established and will take responsibility for auditing processes on a monthly basis, or more frequently if deemed necessary

R E P O R T I N G S Y S T E M S

5. Establish an appropriate reporting system to encourage reporting of concerns and ensure the protection of whistleblowers in line with the Company Whistleblowing policy and procedure. For the avoidance of doubt, the Company Whistleblowing policy will be amended to cover concerns of Modern Slavery and/or Human Trafficking.

R E S P O N S I B I L I T Y F O R T H E P O L I C Y

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

7. A cross-functional team composed of representatives from Sales, Marketing, Finance, HR, Systems, IT and Operations will be established. This team will have functional knowledge and expertise of department specific policies, procedures and supplier relationships, and will therefore be best placed to:

- ensure those reporting to them understand and comply with this statement, and are given adequate, regular training on the issue of modern slavery
- appropriately assess areas of risk within the departmental supply chain and general operations
- work collaboratively to establish long term partnerships with reputable, tried and tested suppliers for the group irrespective of location etc

S A F E G U A R D S

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.

C O M M U N I C A T I O N A N D A W A R E N E S S O F T H I S P O L I C Y

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 Senior Directors and the cross functional team nominated by the business on a regular basis (at least annually) and may be amended from time to time.