



HEAD RESOURCING LTD: MODERN SLAVERY ACT 2015 TRANSPARENCY STATEMENT

Introduction

This is the Modern Slavery Transparency Statement of Head Resourcing Ltd for the financial year ending December 2020. This statement is made pursuant to s.54(1) of the Modern Slavery Act 2015.

The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). Head Resourcing Ltd is committed to combatting all forms of Modern Slavery.

Head Resourcing Ltd recognises that all businesses have a responsibility to ensure that modern slavery and human trafficking are not taking place in their businesses or supply chains.

Our Business

We are committed to continuous improvement in our practices to combat slavery and human trafficking. Since 2001 our recruitment consultants have provided a valuable service to our clients and candidates and we aim to recruit and place candidates in line with our company values.

Our clients appreciate our open and honest approach in everything we do.

Head Resourcing Ltd recognises that Modern Slavery is not an issue confined to overseas recruitment. In particular we recognise the risks that arise from the use of foreign and migrant labour, and from supply chains both in the UK and overseas.

We operate as an employment business and employment agency that supplies contract and permanent staff to companies throughout the UK and abroad.

Our head office is in Edinburgh and we also have offices in Glasgow and Manchester. We have over 140 employees in the U.K.

Our Supply Chains

We have zero tolerance to slavery and human trafficking and expect all those in our supply chain and contractors to comply with our values.

As a staffing provider, all candidates are interviewed prior to submission to a client. Where applicable their identification and right to work in the UK documentation is verified. This may include checking passports, utility bills and Visas where applicable.

In order to protect the integrity of our processes, we do not sub-contract provision of our labour supply.

Our supply chains include sourcing contractors, workers and staff for onward supply to clients. As these parties are directly sourced by Head Resourcing Ltd, our link in any supply chain is predominantly as a supplier. Any supply chain into Head Resourcing Ltd such as the purchase of office stationery and equipment, is incidental.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our workplace policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We have the following policies which incorporate ethical standards for our staff and our workers:

- Anti-bribery
- Corporate Social Responsibility
- Dignity at Work Policy
- Whistleblowing Policy

Due Diligence processes for monitoring Slavery and Human trafficking

Our contracts with clients and suppliers reflect the principles within our policies.

Prior to submission for interview with clients, all candidates are interviewed and our staff are encouraged to bring any concerns they have to the attention of management.

Additionally we carry out an annual internal audit of our own offices to ensure that our high standards, policies and practices are being met.

We are also subject to numerous client and independent checks and audits (i.e. REC Audited and ISO9001) that will help us to detect any issues in relation to modern slavery.

When entering into supplier agreements with providers for office supplies and sundries, wherever possible we utilise trusted companies with whom we have long standing relationships.

We have also recently taken the following steps to further enhance our policies and procedures:

- An external adviser has been engaged to assist the group in assessing Modern Slavery risk and enhancing our policies and procedures
- A Modern Slavery Policy has been put in place

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have reviewed our policies and procedures to ensure that all staff, current and new starts, have access to information that educates them about



modern slavery and spotting the potential signs of modern slavery and includes information on sources of help should they, or their colleagues/friends be concerned about modern slavery.

On an ongoing basis, responsibility lies with the Management Team to ensure that training and our understanding of the issues involved in modern slavery are kept up to date.

Further Steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

In the future, Head Resourcing intends to take additional steps including:

- Expanding due diligence on new suppliers; and
- Provide modern slavery training across our offices to all staff.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2020