

# Modern Slavery Policy and Procedure

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Version: 6.0

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1. The business is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. The business is committed to ensuring that its colleagues 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. The business provides for all of its colleagues, 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 colleagues, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to their line manager or HR.
5. Reports surrounding these issues will be taken extremely seriously by our management team and board of directors, 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
  - Removing that organisation from our preferred supplier list
  - Passing details to appropriate law enforcement bodies
6. As part of our efforts in this area, we review and publish a modern slavery statement on an annual basis.
7. We would also recommend that this policy is read in conjunction with other relevant policies, including our:
  - Anti-bribery policy
  - Corporate social responsibility policy
  - Dignity at Work policy
  - Whistle-blowing policy

This policy has been agreed by our board of directors and our management team.

## **Appendix 1**

### **MODERN SLAVERY ACT 2015 TRANSPARENCY STATEMENT**

#### **Introduction**

This is the Modern Slavery Transparency Statement of the business for the financial year ending December 2025. 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"). The business is committed to combatting all forms of Modern Slavery.

The business 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.

The business 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 an office in Glasgow and a presence in the North of England. We have 55 employees in the UK.

#### **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 the business 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 - 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. Additional checks, in line with client requirements, may include qualification, identity and visa documentation validation.

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 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 previously taken the following steps to further enhance our policies and procedures:

- An external adviser was engaged to assist the group in assessing Modern Slavery risk and enhancing our policies and procedures
- A Modern Slavery Policy was put in place and annual training implemented
- Expanded our due diligence on new suppliers including the implementation of a high-risk supplier questionnaire

### **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 via an annual training course 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:

- Directors will continue to attend relevant events and seminars relating to Modern Slavery to maintain an accurate and up-to-date understanding of relevant legislation, reporting obligations and risk management.
- Continue to raise awareness of modern slavery across our organisation by reviewing and evaluating the measures and processes that we have implemented to ensure their effectiveness.

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 2025.