

Introduction

Slavery, forced labour, unfair labour practices and human trafficking are serious and widespread unfortunate occurrences that can be seen in current times, with the International Labour Organisation (ILO) estimating that 25 million people are victims of forced labour worldwide.

The policy sets down PLUS Recruitment Limited's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks and threats to the human rights of all staff across our supply chain. Staff are expected to report their concerns and management to act upon them.

This Modern Slavery and Human Trafficking Policy relates to actions and activities during the financial year from November 29, 2022 to November 30, 2023.

Organisational Structure and Supply Chains

This policy covers the business activities of PLUS Recruitment Limited. Plus Recruitment Limited is a healthcare recruitment agency specialised in providing temporary & permanent staffing solutions (supply of nurses, support workers & carers) to hospitals, care homes, communities and other facilities. We also provide international recruitment & healthcare startup consultancy services. The company currently operates in the following countries; United Kingdom.

Our healthcare recruitment structure is composed mostly of UK Citizens/Residents, Tier 2 and Tier 4 company staff and candidates, as well as external buyers of healthcare services, like management of hospitals, clinics, residential homes and communities.

The following are the processes by which the company assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking; a doption of a people-centric perspective, identification of modern slavery risk factors, structuring modern slavery statement, development of minimisation, management, and migration strategies.

Our Code of Conduct, Key Policies and Governance Procedures

Our Code of Conduct as included in our Terms and Conditions is based on international standards, asserting that employment must be freely chosen. Across all levels of business and our supply chain, we prohibit the use of force, bonded or involuntary labour. Workers must not be required to lodge deposits, identity documents or any other security with their employer and are free to leave their employment after reasonable notice.

We have a number of policies we employ to support our Code of Conduct. Our **[Employee or Company] Code of Conduct** sets down the actions and behaviours expected of employees when representing the company. These include our **Human Rights Policy** which outlines our commitment to respecting, protecting and promoting the human rights of all people working within our business operations and our supply chains, our customers and our local communities. Our **Migrant and Agency Worker Policy** outlines the responsibilities of Plus Recruitment and all business partners to protect those workers who are more vulnerable to discrimination, exploitation and inferior employment terms, and possible forced labour and human trafficking. Our **Child and Young Worker Policy** outlines internationally recognized standards and best practices for preventing the use of child labour. Plus Recruitment does not engage the use of child labour. Our Statement of **Commitment to Equality** shares our company's values of equality, diversity and inclusion in the workplace, and encourages our clients to recognise and combat discrimination in their own businesses. Our **Whistleblowing policy**- the company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.

All these policies are integrated into our Terms of Contract, company informational sources and our audit-scheduling programmes. Tier-one and Resident clients (buyers of our services) are also required to maintain adequate records to demonstrate their compliance.

Any critical ethical issues are reported to the Human Resource Manager and subsequently the administrative team.

Identification of High Risk Settings

The Human Resource (HR) Manager is responsible for risk assessments. The offer of services for sale (healthcare services, operational services) by our organisation is acknowledged as a high-risk category. Other measures include the identification of vulnerable groups of people, high risk work types, high risk sectors and high risk activities. Vulnerable groups pertinent to the organisation include migrants, women and refugees. High risk work types pertinent to the company include temporary work, seasonal work, low/unskilled work, and potentially hazardous work. High risk sectors of consequence include healthcare, residential care and personal care. The following activities are considered to be at high risk of modern slavery or human trafficking: evidence of a workplace being used for accommodation, workers are distrustful of authorities, workers look uneasy, unkempt or malnourished etc. The following activities are possible incidences of Modern Slavery- physical and sexual violence, intimidation and threats, retention

of identity documents, withholding of wages, debt bondage, abusive working and living conditions and excessive overtime. Responsibility for the company's anti-slavery initiatives is as follows:

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the company requires all staff to complete an online training at induction of business relationship and to undertake a refresher course annually. Training includes the ILO's 11 Indicators of Forced Labour and how to prevent the circumstance should circumstantial precursors start to manifest. Team members are also acquainted with company policies against modern day slavery. Other training media might involve workshops and webinars.

Due Diligence Processes for Slavery and Human Trafficking

The company undertakes due diligence when considering taking on new clients, and regularly reviews its existing clients. The company's due diligence process includes building long-standing relationships with clients and staff and making clear our expectations of business partners AND/OR evaluating the modern slavery and human trafficking risks of each new and existing client by formal or informal audit AND/OR invoking sanctions against clients that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship. Plus Recruitment does not contract with clients/buyers who demonstrate critical non-compliance with our Code of Conduct and principles against modern slavery. Employees are offered support in the face of any challenge and are encouraged to come forward should any situation warrant it.

The Compliance Department is responsible for ensuring due diligence in relation to known or suspected instances of modern slavery and human trafficking. Audit is practiced regularly to monitor key performance indicators and policy adherence.

Performance Indicators

The company refers to certain key performance indicators (KPIs) to measure how effective it is in ensuring slavery and human trafficking do not take place in any part of our business or supply chains. All key parties must demonstrate adequate knowledge and understanding of anti-modern slavery policies and measures at the induction of work relationship and at least annually after. All [relevant] staff must have completed training on Modern Slavery by Care Skills Academy. Expected outcomes by regular audit include; team members depict understanding of indicators of modern slavery at the onset of business relationship and periodically (usually annually), evidence of sufficient knowledge on how to report

suspicious of modern slavery, evidence of sufficient knowledge in modern slavery risks in procurement. All members of supply chain and business partners will be of government-approved adult age, treated fairly and consented to terms and conditions of business. Candidate performance is routinely assessed for early detection of risk factors. Support and encouragement is to be offered to clients and candidates to take relevant action where warranted. This Modern Slavery and Human Trafficking Policy will be regularly reviewed and updated as necessary.

The PLUS Recruitment Management Team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Policy has been approved and authorized by:

Name: Jonas Ayitevie

Position: Director

Date: 29th November 2022

Signature: J.A.

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