



## MODERN SLAVERY POLICY

### Policy Statement

InstaStaff Ltd (the “Company”) has a zero-tolerance approach to modern slavery. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and suppliers.

InstaStaff is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains or operations. InstaStaff strictly prohibits the use of modern slavery and human trafficking throughout our operations and supply chain. InstaStaff expects the same standards and commitment from all its contractors, suppliers, and other third parties.

### Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

**Modern Slavery** is a term used to implicate violations that involve one person depriving another person of their freedom, to exploit them for personal or commercial gain.

**Forced Labour** is all service or work that is exacted from any person under the threat of penalty and for which the said person has not offered himself voluntarily.

**Human Trafficking** is the recruitment and transportation of persons by threat, force or other abuse or vulnerability to gain the consent of a person having control over another person for the purpose of exploitation.

**Debt-Bonded Labour** is where a person’s labour is demanded as a means of repayment for a service or loan.

**Hidden Labour Exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider. It includes forced labour and human trafficking for labour exploitation; payment for work-

finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by perpetrators with victims.

## **Commitments**

InstaStaff, a company that expects everyone working with us, or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation, supply chain and operations.
- The prevention, detection, and reporting of modern slavery in any part of our organisation, supply chain or operations is the responsibility of all those working for or on behalf of InstaStaff. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders, and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
  - Consistent with our risk-based approach we may require:
    - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.
    - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code of Conduct.
- As a part of our ongoing risk assessment and due diligence processes, we will consider whether the circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breached being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

## **Managing Risk**

We understand and identify the risk of potential slavery and human trafficking in our supply chains or operations, using several factors including the supplier's geographical location and the industry in which they operate. As a part of our initiative to identify potential risk we assess existing and new suppliers. We require the following:

- Requiring all staff to comply with the appropriate conditions relating to Modern Slavery to avoid any activity that may lead to, or suggest, a breach of this policy.
- Requiring suppliers to agree and comply with the Modern Slavery Act and that they will adhere to the principles relating to modern slavery and human trafficking before they are approved.
- Establishing clear communication regarding the Company's zero-tolerance approach to modern slavery and human trafficking between all managers responsible for services and all third parties during procurement process, or at the outset of each business relationship.
- Protecting staff from victimisation or retaliation if they raise concerns about modern slavery and human trafficking, even if raised in error.
- Taking any allegation of potential modern slavery and human trafficking seriously and investigating allegations thoroughly.

## **Overview**

InstaStaff aim to always act in a responsible manner, respecting cultural, political, and civil rights of those employed through our business. InstaStaff will comply with the Modern Slavery Act 2015 and with the Human Rights Legislation.