

Modern Slavery Act

Introduction

Due to the nature of our business we recognise that we could be at risk of exposure to modern slavery and human trafficking. We are committed to improving our practices to combat modern slavery and human trafficking. We take this responsibility very seriously and take every step to ensure that we do not do any business with any supply chains that directly or indirectly benefit from modern slavery or human trafficking.

This statement has been produced in accordance with the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2021/22.

Organisation's structure

Farley & Jones are an independently owned staffing solution business established in 2019.

Our supply chain

Our supply chains include outsourcing and subcontracting, procurement of goods and services, distribution supply chains and other agencies.

Supplier adherence to our values and ethics

We have zero tolerance to modern slavery and human trafficking. To ensure that all in our supply chain and contractors comply with our values and ethics, we have a dedicated compliance team, which consists of representatives from the following departments; Compliance, Human Resources, Procurement and Sales.

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 Anti-Slavery and Human Trafficking Policy (included in our Modern Slavery Policy) reflects our commitment to acting ethically and with integrity in all our business relationships. This is to secure implementation and enforcement of effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the business or our supply chains.

All policies are developed and reviewed regularly to incorporate our findings from investigations by our trained Compliance team and subject matter experts.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we adhere to our policy standards along with the guidelines from Stronger Together and the Ethical Trading Initiative. As part of our due diligence, we ensure that all new suppliers are visited on site, suppliers are audited prior to supply and re-audited every year to ensure adherence to our strict standards of ethically transparent supply chains. Our audits include checks on Right to Work, proof of address and National Insurance Number, payslips, duplicate bank details, monitoring of address checks, holiday pay process, memberships (e.g. Sedex, Stronger Together) and if the supplier has a GLAA licence and certificate.

We also have in place systems to:

- Identify and assess potential risk areas in our supply chains, to include country and business transaction risk. Potential risk is a fraudulent ID Card.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- All workers complete a welcome questionnaire in order to highlight any concerns or support that may be required.

Whistleblowing Hotline

We have a free, confidential Whistleblowing Hotline for individuals to raise any concerns that they may have. Reports can be made anonymously. All reports are logged and investigated accordingly. We have Whistleblowing posters displayed across our branches and sites and the poster is visible on the worker app and portal.

As a business we commit to high standards of ethical, moral and legal conduct. We encourage anyone who has any concerns about any aspect of the business to raise them without fear of detriment.

Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking, as well as all aspects of regulations, laws and standards in our supply chains and our business, we provide training to all of our employees.

All new starters are required to attend a Company induction which includes a dedicated module covering Modern Slavery and Human Trafficking, GLAA, Stronger Together, Employee Safeguarding and Wellbeing, and Ethics. This identifies the key areas, what to look for and what to do if concerns are raised. Feedback is obtained for all training modules in order that any suggestions or developments can be built into future training. All employees receive mandatory refresher training, followed by an assessment, every six months, including those staff involved in the supply chain, e.g. Procurement, Sales etc. to ensure that they are aware of our stance on preventing slavery and human trafficking within our business and supply chains.

Our Learning and Development team provide bespoke training for individuals and teams throughout the business, working alongside our clients, drawing upon previous cases and investigations that have been publicised. If any areas are identified as requiring improvement during bespoke training a development plan is put in place where needed. In 2021 we will be rolling out new mandatory training material alongside training videos to ensure all employees are aware of the importance. Representatives from the dedicated Compliance team including, Human Resources, Procurement and Sales along with nominated employees attend workshops, roadshows and webinars, provided by Gangmaster Labour and Abuse Authority, Association of Labour Providers, Stronger Together and

HMRC. Stronger Together Posters have been distributed across all sites and branches to raise awareness of modern slavery and any actions that should be taken. All employees have access to the following policies incorporating ethical standards and can be accessed via a temporary worker portal or company intranet:

- Anti-Slavery and Human Trafficking Policy
- Harassment and Bullying Policy
- Whistleblowing Policy
- Equal Opportunities Policy
- Stronger Together information
- Preventing Hidden Labour Exploitation Policy
- Anti-Corruption & Bribery Policy

Regular business updates are also communicated on the company intranet, detailing local and national cases of combating modern slavery.

All our employees are aware that it is their responsibility to report any concerns or non-compliance of our policies to the nominated people within the Company or via the 'Whistleblowing Hotline.'