

## 360 Recruitment – Modern Slavery Statement

360Rec-04 | 2024-2025

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that 360 Recruitment Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. 360 Recruitment Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our Business**

360 Recruitment Ltd are one of the leading forces in the recruitment industry on a national and international level. The business was set up to provide skilled contractors into the meat industry, however, quickly diversified into new markets. Now the company serves 4 key market sectors. These include: - Meat Processing, Construction, Engineering & Retail senior appointment.

Resulting from its business operations, the Company acknowledges its obligations towards its customers, employees and the communities in which it works, and has decided to document its policy in relation to modern slavery and for this document to be approved by senior management; specifically by the Managing Director.

### **Our High-Risk Areas**

360 Recruitment recognises that there is a risk of modern slavery in areas of our business where there is:

- Migrant Labour
- Young Workers and risk of child labour
- Contract and Agency workers
- Female workers
- Outsourced human resource function

The scope of our modern slavery risk assessment included direct employees and third-party suppliers. We have looked at a number of risks across our business and prioritised the following areas that we must focus on;

- High Priority: Gangs (migrant workers/women workers/young workers)
- Medium Priority: Accommodation – Transport - (migrant/female/young workers)
- Low Priority: Supply chain

We have implemented processes and procedures with the aim of discovering and addressing these issues. This includes independent biannual audits on all of our processes and procedures, we utilise the modern slavery hotline number for all staff and workers. This gives us a strong platform which to investigate issues of modern slavery.

## Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the 360 Recruitment's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of conduct (Business Integrity). This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
5. Labour Standards. Resulting from its business operations, 360 Recruitment acknowledges our obligations towards our customers, employees and the communities in which we work, and we have decided to document our policy in relation to labour standards.

## Our Suppliers

360 Recruitment Ltd operates a supplier policy where the supplier's activity pose a risk to Modern Slavery or Human Trafficking and we maintain a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

## Training

We regularly conduct training for our recruitment/buying teams/managers so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

All Recruiters complete an internal Responsible Recruiter course and sign up to its principles. We utilise the Stronger Together training workshops for appropriate staff including:

- Tackling Modern Slavery in UK Businesses
- Tackling Modern Slavery in Global Supply Chains

### **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

### **Approval for this statement**

This statement was approved by the Board of Directors on 01st May 2023.



Name: Greg Tyler (Director)  
Date: 01/05/2023