

Anti-Slavery and Human Trafficking Policy

1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Swann Recruitment Ltd have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the business or in any part of the supply chains.

1.2 Swann Recruitment Ltd are committed to ensuring there is transparency in the business and in their approach to tackling modern slavery throughout their supply chains. Swann Recruitment Ltd expect the same high standards from all of their contractors, suppliers and other business partners. As part of the contracting processes, Swann Recruitment Ltd include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Swann Recruitment Ltd expect that their suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for Swann Recruitment Ltd on their behalf in any capacity, including employees at all levels, contractors, external consultants, third-party representatives and business partners.

2. RESPONSIBILITY FOR THE POLICY

2.1 Theresa Swann has overall responsibility for ensuring this policy complies with Swann Recruitment Ltd's ethical obligations, and that all those under their control comply with it.

2.2. Theresa Swann has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Supervisors at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on the issue of modern slavery.

3. COMPLIANCE WITH THE POLICY

3.1 All employees of Swann Recruitment Ltd must ensure that they read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for TBR or under their control. Any activity that might lead to, or suggest, a breach of this policy should be avoided.

3.3 Theresa Swann must be told, as soon as possible, if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4. Concerns about any issue or suspicion of modern slavery in any part of Swann Recruitment Ltd business or supply chains should be raised with Theresa Swann at the earliest possible stage however Teresa Swann fully understands that not all people will feel comfortable of making the approach to them and therefore Theresa Swann would encourage reporting of any concerns or information to be provided to the Modern Helpline 08000 121700 where confidential advice and support is available.

3.5. Breaches or suspicion of breaches of this policy must be notified to a supervisor/manager or a report made in accordance with Swann Recruitment Ltd Whistleblowing Policy as soon as possible.

3.6. Swann Recruitment Ltd aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Any such treatment, will not be tolerated and incidents should be reported to Theresa Swann immediately.

4 COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 Training on this policy, and on the risk the business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for Swann Recruitment Ltd.

4.2 Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

5.1 Any employee, unless identified as a victim of modern slavery, who breaches this policy will face disciplinary action that may result in dismissal for misconduct or gross misconduct.

5.2 Swann Recruitment Ltd will consider terminating our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signed:

MD: Theresa Swann.

12 May 2022