



Modern Slavery & Human Trafficking Policy



Be Personnel Limited – 2025

Modern Slavery & 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.
The Company 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 The Company are committed to ensuring there is transparency in the business and in their approach to tackling modern slavery throughout their supply chains. The Company expect the same high standards from all of their contractors, suppliers, and other business partners. As part of the contracting processes, The Company include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The Company expect that their suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for and with The Company on their behalf in any capacity, including employees at all levels, candidates, contractors, external consultants, third-party representatives, and business partners.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The Operations Director has overall responsibility for ensuring this policy complies with the company's ethical obligations, and that all those under their control comply with it.
- 2.2 The Operations Director 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 The Company will 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 The Company or under their control. Any activity that might lead to, or suggest, a breach of this policy should be avoided.
- 3.3 The Operations Director should be notified 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 the company's business or supply chains should be raised at the earliest possible stage; however The Company understands not all people will feel comfortable making the approach to them and therefore The Company would encourage reporting of any concerns or information to the Police (999 or 101 dependent upon the risk to life), the Modern Slavery or Exploitation Helpline 0800 012 1700 or via their website.
- 3.5 Breaches or suspicion of breaches of this policy must be notified to a supervisor/ manager.

3.6 The Company 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 a manager, 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 the company.
- 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. REMEDIATION PROCESS

- 5.1 The Company commits to respond effectively to potential indicators of modern slavery. To safeguard and provide appropriate support to potential victims the below steps should be followed:
- Security of Disclosure - The safeguarding of the potential victim should be the priority unless there is significant risk of harm to others.
 - Gathering Information – Information collected that identifies suspected risks of modern slavery should be documented and held securely. The information gathered should be treated confidentially and processed with the consent of the person making the disclosure.
 - Case escalation – where a potential victim is identified, the responders act with explicit consent of the individual, while confidentiality and discretion are normally maintained unless a) applies.
 - Safeguarding – when a potential victim needs immediate protection and safety, actions will be taken in conjunction with relevant authorities or expert partners, in a way that their personal security is not compromised.
 - Referral to authorities – a referral will be made to authorities to protect the victim from further harm where a potential victim gives their consent.
 - Actions at workplace – cooperation with the client will be established to protect any other persons at risk. A joint review of any report will be undertaken to identify any improvements that are required.
 - Rehabilitation and support – rehabilitation is tailored to the needs of the potential victim.
 - Preventative actions – measures are taken to address the root of any potential abuse, including risk analysis, additional training provision and reinforcing workers' accessibility to share their concerns.

6. BREACHES OF THIS POLICY

- 6.1 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. The Company will consider terminating our relationship with other individuals and organisations working on our behalf if they breach this policy.



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