

## **Modern slavery statement for financial year 2015/16**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Handle 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. Handle 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**

Handle Recruitment Ltd is an Employment business, working in the media sector. We have one London office and the majority of our clients are based in the UK. Our suppliers are based in the UK.

### **Our high risk areas**

We have completed a risk assessment of our suppliers based on their location and the services that they provide and not identified any that are high risk. We will continue to assess all new suppliers.

### **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. **Code of business conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
2. **Anti-bribery policy.** This policy sets out the organisation's stance on bribery and corruption explains how employees can identify any instances of this and where they can go for help.
3. **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. We are committed to market-related pay and reward, which is reviewed annually and linked to professional services firms' benchmarks
4. **Equality and Diversity policy.** We operate a rigorous 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.
5. **Health and Safety Policy.** We expect our employees and suppliers to understand the health and safety risks involved in their workplace.
6. **Data Protection Policy.** We respect the privacy of those whose personal data entrusted to us and treat it in accordance with the Data Protection Act 1998.

7. **Complaints Policy.** We have a transparent and simple process to ensure we provide a high level of service to our clients and candidates.

#### Our suppliers

Handle Recruitment Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

#### Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include

1. online search to ensure that particular organisation has never been convicted of offences relating to modern slavery.
2. mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
3. evaluating the modern slavery and human trafficking risks of each new supplier;
4. reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
5. conducting supplier audits or assessments and creating an annual risk profile for each supplier;
6. invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

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. They pay their employees at least the national living wage
4. 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 people so that they understand more about this growing issue and how to report any suspicions they may have, whether in a business or personal context. We have highlighted the [modernslavery.co.uk](http://modernslavery.co.uk) site to all our employees, which holds useful information on how to recognise different types of slavery, how to spot the signs and provides details of a telephone helpline.

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 08 November 2017

Name: Peter Tafler  
Signature

A handwritten signature in black ink, appearing to read 'Peter Tafler', written over a horizontal line.