

Introduction

This statement sets out **1st Step Solutions Ltd's** actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. As part of both the Recruitment Industry and Construction Industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of **1st Step Solutions Ltd**

The Company is a recruitment business, and our supply chain involves Intermediaries, Office Supplies, Print & promotional items, Software and IT Support and PPE suppliers.

As an organisation, we are a supply chain partner to supply candidates to employer clients.

Countries of operation and supply: The organisation currently operates in the following countries:

- United Kingdom
- United States of America

Process: The following is the process by which the company assesses whether particular activities or countries are high risk in relation to slavery or human trafficking:

1st Step fully references and researches all candidates for both direct employment with its own business, and for those supplied to our clients, to ensure that compliance with state laws and by laws, such as National Living Wage, are abided by. We expect our supply chain to act in a responsible manner towards all governing laws in whichever state they operate.

High-risk activities: The following activities are considered to be at high risk of slavery or human trafficking:

- Recruitment of Temporary Workers
- Purchase of promotional items manufactured overseas

Responsibility: Responsibility for the organisation's anti-slavery initiatives is as follows:

- Careena Dabbs, Group Operations Director
- Simon Cowdrey, Chairman
- Andy Brooks, Divisional MD
- Tony Clayden, Divisional MD
- Ashley Boyce, Group HR Coordinator
- All employee's involved in temporary recruitment functions

All employment policies are reviewed for compliance and ethical value before implementation

Ongoing risk assessments: The Company reviews all terms and conditions of employment, locations and duties, and clients where the recruitment is for an end user, to ensure that modern legal and ethical standards are adhered to

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:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- 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 provide examples.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation now:

- Requires all senior recruitment personnel to undergo training on modern slavery
- Has a supply chain verification system, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Has reviewed its existing supply chains, whereby the organisation has evaluates all existing suppliers.

Training

The organisation requires all senior staff and HR professionals to undertake training modules available on the Supply Chain Sustainability School.

The organisation's modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by placing this Modern Slavery and Human Trafficking Policy on our Company HR Portal (breatheHR). This policy will also be incorporated into the Employee Handbook.

This policy will be reviewed at least annually.

Signed;

Simon Cowdrey | Chairman

April 2021

