

## Modern Slavery and Human Trafficking

### Introduction

Pin-Point Recruitment recognises the vital importance of tackling Modern Slavery and human trafficking (slavery, servitude, forced labour and human trafficking). Pin Point Recruitment acts to achieve the highest ethical standards and to prevent and identify Modern

Slavery and human trafficking within its businesses and supply chains.

We are committed to working with our suppliers to ensure they have appropriate ethical and responsible policies and processes in place and support them in closing any areas of risk these checks may identify.

### About our Business

Pin-Point Recruitment is a labour provider and operates from multiple locations across the UK and are one of the top suppliers of contractual labour pay rolling at peak, in excess of 10,000 temporary colleagues.

Pin-Point Recruitment is a specialist provider in providing large scale volume temporary recruitment solutions within the warehouse, distribution, food and manufacturing industries.

We provide bespoke onsite managed services, remote and branch lead recruitment models for multiple site locations across the UK.

As a group we are committed to working alongside any organisation which will support in the overall aim of reducing Modern Slavery within our supply chain and across the UK.

### Exposure of Modern Slavery

We know that as a large supplier of labour, particularly to the food sector, multiple Modern Slavery risk factors may be present in our own operations and our supply chain and these may not be obviously apparent.

We also recognise that factors such as the current pandemic can affect those who are vulnerable and they may be at greater risk of falling victim to Modern Slavery and human trafficking.

We adhere to the Base Code to ensure employment is freely chosen. We have identified our salient risks and set out our commitment to tackle and prevent these risks in our Forced Labour and Ethical Policy.

## Policies and Procedures

Our Preventing Hidden Labour Exploitation Policy and a Forced Labour and Ethical Policy sets out the responsibilities of each individual within the business to identify and report any suspicions of potential cases of exploitation.

Our Responsible Sourcing and Supply Policy has been developed for the responsible sourcing and supply of workers which, complies with national laws, global standards, and the ethical codes of our labour user clients which further sets out specific protections and access to remedy for all workers.

Our Standard Operating Procedures imbed our practice that all those in our operations and supply chains, remain vigilant during the entire on boarding and recruitment process to identify indicators (“Alert Flags”) of Modern Slavery and if any such concerns are present to handle these sensitively and professionally.

Collaborative meetings and processes are developed and implemented alongside our Labour Users to strengthen our ability to identify and prevent potential cases of Modern Slavery.

Policies and procedures are developed and reviewed regularly to incorporate our findings from investigations by our trained Compliance Department alongside the relevant subject matter expert, and signed off at Director level.

In 2020 we revised a number of policies including our whistleblowing policy which sets out the Company’s commitment to high standards of ethical, moral and legal business conduct. In line with that commitment, we encourage those who have serious concerns about any aspect of the organisations work to come forward and voice those concerns without fear of detriment.

We require all 2nd tier labour suppliers to adhere to applicable national laws and standards in relation to labour practices and human rights, including the Modern Slavery Act 2015 and have the appropriate policies in place.

In 2019 along with other likeminded recruitment businesses a new group was formed titled the Compliance Intelligence Network (CIN); the aim of this group is to work together to combat Modern Slavery, share best practice and share information and intelligence on a local level.

In 2020 we strengthened our recruitment processes and training of labour exploitation to take account of the conditions the pandemic imposed on the recruitment process and the risks that may be open to vulnerable individuals who may be at greater risk of labour exploitation.

Version 4.0 Issue Date: July 2024 Review Date: July 2025	Owner: Terry Carney Approved by: Stephen Hall	Page 2 of 4
<b>Uncontrolled if Printed - Status of document should be checked before use.</b>		

## Due Diligence Processes

We understand that our biggest exposure to Modern Slavery is within the recruitment process and so due diligence is expected from the first point of contact with our candidates and to be a constant presence through the employment relationship.

These include:

Welfare Intelligence – All workers are invited to complete a welfare questionnaire via our online portal when they register with us. This highlights any Alert Flags and further welfare meetings are held where required.

Reporting on Intelligence – we report weekly on houses of multiply occupancy, dual bank accounts and mobile numbers to monitor potential indicators across our group. All concerns are investigated and we liaise with local councils to investigate all accommodation Alert Flags further.

Robust auditing – Our auditing process is in place to ensure all of our operations and partners in our supply chain adhere to our standards and comply with the relevant legislation /

regulations and are, amongst other things, intended to identify any Modern Slavery practices or areas of potential risk to the supply chain.

2<sup>nd</sup> Tier Labour Providers – All 2nd tier labour providers are subjected to a due diligence audit prior to supply, and then, an annual audit. This is to ensure they hold a GLAA licence and meet our required standards of supply, including, how they are applying and adhering to the applicable national laws and standards, their human rights policy and procedures, as well as labour practices and HSE. The output of these assessments are assessed by the Quality and Compliance Department to monitor for areas of potential risk.

If a supplier’s practices are found to be unsatisfactory or non-conformant, we will arrange a full audit inspection and address the outcome on a case by case basis, seeking external advice where appropriate.

## Training and Awareness

We recognise that knowledge is key and all employees must complete our mandatory Modern

Slavery training upon commencement of their employment and commit to preventing labour exploitation by agreeing to our “Recruiter Compliance Principles”.

Bespoke training is given to those locations identified at higher risk, using previous cases and investigations as training material.

Newsletters highlighting recent Modern Slavery suspicions in the community and how we have tackled Modern Slavery, along with posters are routinely published across the business to reinforce our commitment to tackling Modern Slavery.

Version 4.0 Issue Date: July 2024 Review Date: July 2025	Owner: Terry Carney	Page 3 of 4
Approved by: Stephen Hall		

In 2020 we strengthened our training and held webinars for all of our employees to share our findings through intelligence and investigations so all employees can proficiently care and manage any indicators or any acts of potential Modern Slavery.

In 2020 we rolled out new training material to accompany our current training videos to raise further awareness amongst our temporary workforce.

In 2021 we aim to launch our new Flexi-Worker training platform. This will provide our temporary employees with a platform to carry out up to date e-learning and understand the risks they may be exposed to in relation to Modern Slavery and how to report any concerns they have without any recourse or detriment.

The attendance of roadshows, webinars and workshops provided by external companies such as the Association of Labour Providers, Stronger Together and the Gangmaster Labour and Abuse Authority is promoted to all relevant staff and top level management in order to maintain knowledge and distribute across the business.

### Summary

Pin-Point Recruitment commits to ensuring we operate towards the best practices at all times

By continually assessing the risks of any form of Modern Slavery taking place within our operations and implementing processes and policies to try to minimise these risks, we are able to support the relevant Government authorities in reporting any identified situations, and as such protect our business, our Labour Users businesses and first and foremost, our Flexi Workers.

### Declaration

This statement has been made in accordance with the reporting requirements of Clause 54,

Part 6 of the UK Modern Slavery Act for the year ending 31 December 2022

**Stephen Hall**  
**Managing Director**

Version 4.0 Issue Date: July 2024 Review Date: July 2025	Owner: Terry Carney Approved by: Stephen Hall	Page 4 of 4
--	--	-------------