



# Anti-slavery and Human Trafficking Policy



## **1. Policy statement**

1.1 Modern slavery is a crime and a violation of an individual's fundamental human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within the businesses of Interaction Recruitment or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own businesses and in our approach to tackling modern slavery throughout our business, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we will include specific prohibitions concerning modern slavery, whether of adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## **2. Who does this policy apply to?**

2.1 This policy applies to all full and part-time employees, as well as temporary staff, whenever they are working. It also applies to agents, contractors and other third parties acting on our behalf in any capacity.

2.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **3. Responsibility for the policy**

3.1 Interaction Recruitment plc has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

3.2 Interaction Recruitments Compliance Department, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and engaging internal audit resource to audit internal control systems and procedures to ensure they are effective in countering modern slavery.

3.3 Management 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 it and the issue of modern slavery in supply chains.

## **4. Compliance with the policy**

4.1 You must ensure that you read, understand and comply with this policy.

4.2 The prevention, detection and reporting of modern slavery in any part of our businesses or supply chains is the responsibility of all of us.

4.3 You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.4 You are expected to report as soon as possible:

- whether you know or suspect any instance of modern slavery is occurring in any part of our businesses or supply chains; and
- whether you know or suspect a breach of this policy is/has occurred

to your line manager, or a member of the Compliance Department.



4.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any of our businesses or supply chains constitutes any of the various forms of modern slavery, raise it with your line manager, or a member of the Compliance Department

4.6 We 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 as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our businesses or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern

## **5. Communication and awareness of this policy**

5.1 Regular training on this policy and on the risks our businesses face from modern slavery in its supply chains will be provided as necessary.

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

## **6. Breaches of this policy**

Non-compliance with this policy by employees may result in disciplinary action up to and including summary dismissal, and by contractors, agents or other third parties working on our behalf, in termination of contract.

## **7. Further information**

If you have any queries regarding this policy please contact a member of the Compliance department: on 01480 436111

## **8. How to raise a concern**

If you have a concern or suspect a violation of this policy we want you to speak up immediately. Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously and investigated appropriately. If you act in good faith, believing your information is accurate, we will protect you even if you are wrong. Some concerns can be addressed by speaking to the person whose conduct is the cause for concern. We understand that this is not always possible, so we suggest that you speak to your line manager.