

# MODERN SLAVERY ACT STATEMENT

## INTRODUCTION

This statement is made on behalf of STR Limited (STR). Any references to 'we' 'us' or 'ours' shall be interpreted as references to STR, as the context so requires.

This is our annual statement of slavery and human trafficking, made in compliance with Section 54 of the Modern Slavery Act 2015 (the "Act"), in which we explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it. We are committed to improving our practices to combat slavery and human trafficking.

## ORGANISATION'S STRUCTURE

We are a part of the STR Group and our ultimate parent company is STR Group Limited. STR Group Limited has its head office in England, and is an international recruitment business, operating from 5 offices across the United Kingdom and the United States. The Group has over 150 employees worldwide.

We supply candidates to clients based in many different countries across the world, and we operate under 6 successful complimentary brands with expertise in recruitment and related services in the following sectors: Automation, Built Environment, Engineering & Manufacturing, Life Sciences, Maritime and Professional Services. We share the same values across all our brands.

Our supply chain is comprised of suppliers who provide goods and services to us, and includes umbrella companies, other recruitment agencies and workers who provide services via limited companies and Statement of Work solutions.

The Group has a global annual turnover of approximately £50m.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. This policy is available to, accessible by and applicable to all our employees, officers and directors. Any and all amendments are immediately drawn to their attention and they are required to acknowledge that they have read, understood and agree to all obligations.

Our employees are directed to immediately report any information from any source that alleges a violation of our Modern Slavery Policy. We also operate a Whistleblowing Policy so that all employees know they can raise concerns regarding how colleagues or candidates are being treated, or practices within our business or supply chain, without fear of reprisals.

## OUR APPROACH

To date we have taken the following approach to eradicating human trafficking from within our business:

- We continue to raise awareness of our Modern Slavery Policy to all employees within our business to reinforce the importance we place on compliance with its principles;
- Having reviewed the Group's terms and conditions again in the last 12 months, we can confidently assert that they are fit for purpose and robust, and have ensured that where

possible our counterparts are either specifically required to comply with the Act, or that there is a clause requiring them to comply with all applicable laws (including the Act by implication);


- We maintain oversight through our Legal & Compliance team to whom all employees can address issues of concern;
- We maintain a Whistleblowing Policy and procedures to support staff and contractors who raise any concerns;
- We regularly engage with other organisations and professional bodies to learn and share best practice, including membership of the Recruitment & Employment Confederation (REC); and
- We maintain an accreditation to the Maritime Labour Convention (MLC) and to the Gangmasters Licencing Authority (GLA) to evidence our commitment to those we engage with in these sectors, to their well-being and safety.

## FURTHER STEPS

We continue to focus on the following areas as we progress toward the new financial years to combat slavery and human trafficking in our business:

- Continue to identify, understand and map the Group's supply chains and focus on areas where there is a potentially higher risk of modern slavery;
- Regularly review our on-boarding processes and practice to ensure that our procedures regarding identity and compliance checks are as robust as possible; and
- Maintain and enhance our internal onboarding training to ensure that understanding surrounding modern slavery remains fresh and relevant particularly in industry sectors deemed to be higher risk insofar as the Act is concerned.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019.

**Signed** 

**Name** Clive Hutchings

**Position** CEO

**Date** 29<sup>th</sup> September 2020