

Company Name:	Twenty-Four Seven Recruitment Services Ltd					
Policy Name:	Forced Labour and Ethical Policy					
Review Date:	V1					
	24/02/22					
Reviewed and authorised by:	Amanda Lillis - HR Director					

Policy Statement

The Company recognises its responsibility in combatting forced labour in our Company and in our supply chain.

Scope

This Policy applies to all staff and temporary-workers, business partners, including suppliers, service providers, subcontractors and 2nd tier labour providers are also required to adhere to the standards set out in this Policy.

The requirements in this Policy constitute minimum and not maximum standards and should not be used to prevent the exceeding of these standards. Where the provisions of law and this Policy address the same issues, both we, and our business partners must apply whichever provision affords the greater protection.

The term forced labour used in this policy includes slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

Forced labour is not limited to situations where the worker has been coerced by violence or intimidation, it also includes more subtle means of control, including deception and fraud, debt manipulation, retention of pay or identity papers, threats of denunciation to government authorities, or exploitation of vulnerability or power imbalances. Private individuals, business, or state authority can impose forced labour, and it can occur in any industry (formal or informal).

Responsibilities

The Board of Directors and Senior Leadership Team are responsible for supervising the implementation of and compliance with this policy. The Managing Director assumes operational responsibility for the implementation of and compliance with the declaration of the Policy.

It is the responsibility of all employees and workers throughout the business to ensure this policy is adhered to within all its recruitment practices.

Policy Commitments

We oppose the use and exploitation of forced labour, and we expect all those who work for us or on our behalf to share our zero-tolerance approach.

Coercion

1. Freedom of Employment: All workers shall have the right to enter into employment voluntarily and freely, without the threat of a penalty.
2. Termination of Employment: Workers shall have the freedom to terminate employment of indefinite or long durations by means of notice of reasonable length (in accordance with national law or collective agreement) at any time without penalty. Workers on contracts of fixed duration shall not be required to serve beyond the expiry of their contract. Employers shall not use means to restrict a worker's ability to terminate employment, for example by requiring deposits, withholding employee

documentation, threats, or use of violence, imposing financial penalties or requiring payment of recruitment fees.

3. Threat of Violence, Harassment & Intimidation: Employers shall not exact work or service from any person under the menace of penalty. This includes the use or threat of physical or sexual violence or harassment.

Coercion in Wage Payment, including Debt Bondage and Bonded Labour

4. Wages shall be paid regularly, and methods of payment are prohibited that deprive workers of the genuine possibility of terminating employment. Wage payments shall not be delayed or deferred such that wage arrears accumulate.
5. Wages shall be paid directly to the worker and should be paid in legal tender by BACs transfer, cheque or money order where permitted by law, collective agreement or with the consent of the worker. Payment in the form of vouchers, coupons or promissory notes is prohibited.
6. Payments "in-kind" in the form of goods or services shall not be used to create a state of dependency of the worker on the employer. "In-kind" payments should only be partial to ensure that the worker is not totally deprived of cash remuneration and are permitted only if authorised by national law, regulation or collective agreement.
7. Workers that earn wages calculated on a performance-related or piece-rate basis shall not earn less than the legally mandated minimum wage.
8. Workers shall not be held in debt bondage or forced to work for an employer in order to pay off an actually incurred or inherited debt.
9. Deception in wage payment, wage advances, and loans to employees shall not be used as a means to bind workers to employment. Advances and loans, and deductions from wages made for their repayment, shall not exceed the limits prescribed by national law. Workers shall be duly informed of the terms and conditions surrounding the granting and repayment of advances and loans
10. No deductions from wages shall be made with the aim of indebting a worker and binding him or her to employment, and measures should be taken to limit wage deductions to prevent such conditions. Workers shall be informed of the conditions and extent of wage deductions, and only deductions authorised by national law, collective agreement or arbitration award shall be made.

Disciplinary Measures

11. Disciplinary measures should not include sanctions that result in an obligation to work.
12. Compulsory labour shall not be used to discipline workers or as punishment for participation in a strike.

Compulsory Overtime

13. Workers shall not be forced to work overtime above the limits permitted in national law and collective agreements under the menace of a penalty, for example the threat of dismissal.
14. Work or service outside normal daily working hours shall not be imposed by exploiting a worker's vulnerability under the menace of a penalty. For example, employers shall not set performance targets that result in an obligation to work beyond normal working hours because of the worker's need to be able to earn the minimum wage.
15. Freedom of Movement: Coercion shall not be used to physically confine or imprison workers to the workplace or related premises, for example employer-operated residences. Mandatory residence in employer - operated residences shall not be made a condition of employment.
16. Conditions relating to Skills Development & Vocational Training: Training opportunities provided to

employees shall be undertaken voluntarily. Employers that provide such opportunities shall not unreasonably impose work or service as a means of recovering the costs associated with them.

Human Trafficking & Forced Labour

Migration for Employment:

17. Migrant workers, irrespective of their legal status, shall be treated fairly, and measures shall be taken to prevent abusive conditions and fraudulent practices that may lead to coercion and trafficking for labour exploitation.
18. Migrant workers shall benefit from conditions of work no less favourable than those available to local workers and shall have the right to enter into and terminate employment (with reasonable notice in accordance with national law or collective agreement) voluntarily and freely, without the threat of a penalty.
19. Employers shall not threaten irregular migrant workers or their family members with denunciation to the authorities or otherwise coerce such workers into taking up or maintaining employment.
20. Recruitment of Migrant Workers: No fee or cost for recruitment shall be charged directly or indirectly, in whole or in part, to the worker.

Document Retention:

21. Practices such as confiscating or withholding worker identity documents, money or possessions, or other valuable items (e.g. work permits and travel documentation) are strictly prohibited.
22. However, if requested by workers, employers may provide secure storage for such documents. Workers must then be free to access them at any time upon request.
23. Employers shall not retain personal documents for the purpose of binding workers to employment.

Second Tier Suppliers:

24. Ensure that such agencies do not engage in fraudulent practices that place workers at risk of forced labour and trafficking for labour exploitation;
25. Prevent the abuse of workers contracted by such agencies, for example by ensuring that such workers receive adequate protection in relation to wage-related matters, working hours, overtime and other working conditions;
26. To the greatest extent possible, ensure that fees or costs related to recruitment are not borne by workers but by the contracting company;
27. Use only those recruitment agencies that are licensed or certified by the Company.

Contracts of Employment

28. Employers shall provide written contracts of employment that clearly indicate their rights and responsibilities with regard to payment of wages, working hours, valid grounds for termination, and other issues related to preventing forced labour.

Worst Forms of Child Labour

29. We shall take immediate and effective measures to prevent and eliminate the engagement of children in the worst forms of child labour, including debt bondage, serfdom, forced or compulsory labour, and all forms of slavery and practices similar to slavery, such as the sale and trafficking of children.
30. Should we engage any second-tier employment agencies, we shall ensure that such agencies do not engage children in the worst forms of child labour as indicated above.

31. No employment of any person below the age of eighteen years at any workplace throughout the company unless authorised through the HR Department, along with the relevant risk assessments which must be conducted prior to allowing work.

We prohibit the use of child labour and forced or compulsory labour at all its locations. No employee is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work.

There is a zero tolerance policy towards this breach. Employment contracts and other records, documenting all relevant details of the employees, including age, are maintained at all units and are open to verification by any authorised personnel or relevant statutory body.

Review and improvement

The Company commits to the principle of continuous improvement. Any systems in place must be regularly evaluated and assessed on the basis of measurable effectiveness, in accordance with changing environments, and be adapted or expanded as required. The HR Director will review and update this policy at regular intervals.