

# PREVENTING HIDDEN LABOUR EXPLOITATION POLICY

We are committed to adopting a proactive approach to tackling hidden labour exploitation and will not tolerate any form of labour exploitation of our workers or colleagues. Exploitation can include forced labour and human trafficking, including asylum seekers and immigrants for labour exploitation; payment for work-finding services and work related exploitation such as forced use of accommodation.

Not everyone sees themselves as a victim, or they may be reluctant to come forward and subsequently the act of exploitation can be well hidden. In this respect we will ensure that the Management Team are fully aware of the requirements of the Modern Slavery Act 2015, the International Labour Organisation's core conventions & UN Global Compact and be vigilant in enforcing compliance.

In support of this policy the ISS Board will:

- Designate appropriate Managers to attend training and to have responsibility for development and operating company procedures that support this policy
- Ensure that job finding fees are absorbed by the company and will under no circumstances allow these to be paid by job applicants
- Not use any individual or organisation to source and supply workers without confirming first that that workers are not being charged a work finding fee
- Ensure that all staff responsible for directly recruiting workers are aware of issues around third party exploitation and that they are well informed of the signs to look for
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the police and any relevant regulating bodies
- Communicate information on tackling "Hidden Labour Exploitation" to our workforce through our monthly worker briefings
- Encourage employees and agency workers to report cases of hidden third party labour exploitation and provide a confidential means to do so
- Investigate and act on reports in a timely and appropriate manner
- Work with the police in dealing with any complaints and provide access to documentation where required
- Require other organisations in the labour supply chain to adopt policies and procedures in adherence with the Modern Slavery Act, International Labour Organisation's core conventions & UN Global Compact

This policy will be communicated to all staff, made available to our clients, suppliers and associates on request and regularly reviewed for effectiveness.



**Gary Beeston**  
Managing Director

