

**Think Purple Training and Recruitment Est. 2001 Limited || Effective Date: 01/2018-01/19**

## **Anti-Slavery and Human Trafficking Policy**

### **Policy Statement**

This Policy applies to all persons working for us or on our behalf in any capacity, including directors, employees, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Think Purple strictly prohibits the use of Modern Slavery and Human Trafficking in our operation and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains (the clients). We expect that our clients will hold their own policy to the same standards.

### **Commitments**

Modern Slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

We regularly conduct training for the staff within the Employment Business (Think Purple) so that they fully understand the signs of modern slavery/human trafficking and what they must do if they suspect that it is taking place. We also operate numerous of other important internal policies to ensure that we are conducting our business in an ethical and lawful manner. Some of the policies we have in place are: Whistleblowing, Code of Conduct, Recruitment Policy, and Equal Opportunities.

We as a company shall expect that everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy and the client's policy.
- We are committed to engaging with our clients to address the risk of modern slavery in our operations.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant in the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also ask our clients to comply with our Code of Conduct. This sets out the minimum standards required to combat modern slavery and human trafficking.
- Consistent with our risk-based approach we may require other employment agencies which we may second tier through and our clients to confirm their compliance.
- As a part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits on our clients to see their compliance.

- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take an appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminate such relationships.