



# Modern Slavery Policy - Anti-slavery & Human Trafficking policy

OWNER  
LAST REVIEWED  
VERSION

Board of Directors  
January 2025  
5

## Introduction

Modern slavery is a crime and a violation of fundamental human rights. It encompasses slavery, servitude, forced and compulsory labour, and human trafficking, all of which involve depriving a person of their liberty to exploit them for personal or commercial gain.

Red Sky Personnel Ltd operates with a zero-tolerance approach to modern slavery in all its forms. We are committed to acting ethically, with integrity, and in compliance with all relevant laws and regulations, including the Modern Slavery Act 2015. We hold a Gangmasters and Labour Abuse Authority (GLAA) licence, which underscores our commitment to preventing exploitation and abuse within our supply chains and business operations.

Our approach includes implementing and enforcing effective systems and controls to ensure modern slavery is not present in our organisation or supply chains. We also ensure transparency in our business dealings, consistent with our disclosure obligations under the Modern Slavery Act.

We expect the same high standards from all our contractors, suppliers, and business partners. To this end, we include specific prohibitions against the use of forced, compulsory, or trafficked labour in our contracts and require that suppliers impose these same standards throughout their supply chains.

This policy applies to all persons working for or on behalf of Red Sky Personnel Ltd, including employees at all levels, directors, officers, agency workers, contractors, suppliers, and business partners.

## Responsibility for the Policy

1. **Overall Responsibility:** The **Board of Directors** has ultimate responsibility for ensuring compliance with this policy and adherence to our legal and ethical obligations.
2. **Staff Training:** All employees receive training on the **Modern Slavery Act 2015** during induction and at regular intervals thereafter to ensure they understand the signs of modern slavery and how to report concerns.
3. **Management Accountability:** Line managers at all levels are responsible for ensuring that employees under their supervision understand and comply with this policy.

## Compliance with the Policy

### 1. Staff Responsibilities:

- All employees, contractors, and business partners must read, understand, and comply with this policy.
- You must avoid any actions that might suggest a breach of this policy.

### 2. Reporting Suspicions:

- Notify your line manager or the Board of Directors if you suspect modern slavery is occurring within our business or supply chains.
- Reports can also be made through our **Whistleblowing Policy** for confidentiality and protection against retaliation.

### 3. Encouragement of Openness:

- We are committed to protecting those who report concerns in good faith. No one will face detrimental treatment for raising a suspicion, even if mistaken.
- Detrimental treatment includes dismissal, disciplinary action, or any form of retaliation.

### 4. GLAA Standards Compliance:

- As a GLAA-licensed organisation, we follow stringent standards to safeguard workers in high-risk sectors, ensuring ethical recruitment and employment practices.
- We undergo regular audits and maintain full compliance with GLAA licence requirements to prevent exploitation.

## Prevention Measures

### 1. Supplier and Partner Engagement:

- We communicate our zero-tolerance approach to all suppliers, contractors, and business partners at the outset of our business relationships.
- We require suppliers to adopt policies aligned with the **Modern Slavery Act 2015** and ensure compliance within their own supply chains.

### 2. Risk Assessments:

- We conduct regular risk assessments to identify vulnerabilities in our operations and supply chains.
- Specific focus is placed on high-risk industries and geographic regions.

**3. Due Diligence:**

- Thorough due diligence is carried out on all new and existing suppliers, including reviews of their modern slavery policies and compliance.
- Audits and inspections are conducted where necessary to verify adherence to our standards.

**Breaches of This Policy**

**1. For Employees:**

- Breaches of this policy may result in disciplinary action, up to and including dismissal for gross misconduct.

**2. For Business Partners:**

- Relationships with individuals or organisations found to violate this policy may be terminated immediately.

**Communication and Awareness**

**1. Training:**

- All staff are trained on the risks of modern slavery and the requirements of the Modern Slavery Act.
- Training includes identifying signs of forced labour, servitude, and human trafficking.

**2. External Communication:**

- This policy is publicly available on our website to demonstrate our commitment to preventing modern slavery.

**Monitoring and Review**

The effectiveness of this policy will be regularly reviewed by the **Board of Directors**, with updates made to address new risks or changes in legislation. Feedback from employees, suppliers, and stakeholders is welcomed to improve its implementation and effectiveness.