

Company Policy & Operating Procedure

JT/FLE - Forced Labour & Ethical Policy

Definitions

“**The Company**” or “**Job&Talent**” means Jobandtalent UK Ltd incorporating Jobandtalent Works Ltd, Single Resource Ltd, Extra Personnel Ltd and all trading subsidiaries (Extra Aviation, ep professional and Extra Drivers) and Extra Automotive Ltd.

“**Staff/Employees**” means all individuals employed by Job&Talent.

“**Workers**” means all workers engaged by Jobandtalent Works Ltd, Single Resource Ltd, Extra Personnel Ltd and Extra Personnel Automotive Ltd as detailed in their Terms of Engagement.

“**Labour User (LU)**” means the Job&Talent’s client where Staff/workers are engaged.

Policy Statement

The Company recognises the responsibility it shares with its suppliers to tackle forced labour.

Scope

All staff/workers at all levels within the Company.

Related Documents

JT/RR Responsible Recruitment Policy

JT/RFR Red Flag Reporting

JT/RFG - red Flag Guidance

JT/IMSE - Investigating Modern Slavery & Exploitation

Responsibilities

It is the responsibility of the Compliance Department to develop, implement and review this policy.

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

It is the responsibility of the Compliance Department to monitor and assess the full achievement of this policy.

Policy Commitments

Coercion

- Freedom of Employment: All workers shall have the right to enter into employment voluntarily and freely, without the threat of a penalty.
- 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.
- 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

- 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.
- 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.
- 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.
- Workers that earn wages calculated on a performance-related or piece-rate basis shall not earn less than the legally mandated minimum wage.

- 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.
- 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
- 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

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

Compulsory Overtime

- 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.
- 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.
- 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.
- 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:

- 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.
- 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.
- 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.
- 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:

- Practices such as confiscating or withholding worker identity documents or other valuable items (e.g. work permits and travel documentation) are prohibited.
- 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.
- Employers shall not retain personal documents for the purpose of binding workers to employment.

Second Tier Suppliers:

- Ensure that such agencies do not engage in fraudulent practices that place workers at risk of forced labour and trafficking for labour exploitation;
- 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;
- To the greatest extent possible, ensure that fees or costs related to recruitment are not borne by workers but by the contracting company;
- Use only those recruitment agencies that are licensed or certified by the Compliance Department.

Contracts of Employment

- 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

- 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.
- 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.
- No employment of any person below the age of eighteen years at any workplace throughout the company unless authorised through the HR and Compliance 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

Training

All members of staff are required to complete our mandatory basic Modern Slavery training module. All Operation teams (that includes all recruiters, labour coordinators with their managers) are required to complete in addition advance Modern Slavery training module.

Non-compliance

The Company takes its commitment to the policy seriously and so, in cases where the Policy and Procedure has not been adhered to, the Company may deal with such matters via the Company disciplinary procedure.

Monitor and Review

The Compliance department is responsible for the continuous improvement of the Forced Labour and Ethical Policy

Approval

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