

# Modern Slavery Act Transparency Statement

## Slavery and Human Trafficking

JMQ Recruitment does not condone and will not participate in any form of human exploitation, including child or forced labour, slavery and / or people trafficking. JMQ Recruitment is aware of the provisions of the Modern Slavery Act 2015 (the “Act”) and this statement sets out the steps that JMQ Recruitment has taken to try and remove the risk that slavery and human trafficking is taking place in its supply chain or within JMQ Recruitment’s business.

## Our Policies

JMQ Recruitment is committed to ensuring that slavery and human trafficking is not taking place in its supply chain or as part of JMQ Recruitment’s business. Many of JMQ Recruitment’s existing policies contain relevant elements which seek to ensure that this is the case, including the following which are either implemented or are in the course of being implemented across JMQ Recruitment:

- **Group Code of Conduct and Ethics**, applicable to all affiliates, sets out JMQ Recruitment’s expectation that all employees should behave in an ethical and law-abiding manner. This Code includes also JMQ Recruitment’s commitment to respecting the human rights and all applicable laws and international requirements regarding labour as well as to protecting employees.
- **Dignity at Work Policy** sets out JMQ Recruitment’s ethos that each JMQ Recruitment employee has a right to work in a safe and supportive environment. JMQ Recruitment recognises and respects the legal and moral rights of all persons affected by its operations and is committed to providing a working environment free of harassment, discrimination or prejudice. It reaffirms JMQ Recruitment’s strong belief in the benefits of non-discrimination and equality of opportunity.
- **Whistleblowing Policy**, under which JMQ Recruitment commits to the highest standards of openness, probity and accountability. The effectiveness of this policy is further enhanced following the roll-out of the already existing 24-hour, confidential, whistleblowing hotline, operated by an independent partner, which all employees are

encouraged to use to report serious concerns concerning matters in the workplace.

- **Supplier Code of Conduct**, under which JMQ Recruitment requires its suppliers to conduct employee relations in an ethical manner and in compliance with rules stipulated by both international and local laws and industry standards.
- **Recruitment standards**, which require pre-employment checks to be made in line with applicable legislation on all new employees, including a candidates' eligibility to work.

### Risk Assessment and Due Diligence

The risk of slavery and human trafficking within JMQ Recruitment's organisation is considered to be substantially diminished through the implementation of the above-mentioned policies. In addition, JMQ Recruitment seeks to identify and minimise the risk of slavery and human trafficking in its supply chain by endeavouring to select suppliers who adopt high ethical standards which are consistent with JMQ Recruitment's corporate beliefs and values, and seeks to build long standing relationships with these suppliers. These standards include respecting the rights of the individuals who are employed by them.

As such, JMQ Recruitment expects its suppliers (and their subcontractors) to operate their businesses and conduct employee relations in an ethical manner and to meet the requirements stipulated by both international and regional laws and industry standards.

### Training and effectiveness

Should any concerns be held in relation to unethical behaviour, they can be raised in confidence via this hotline and will be subject to prompt investigation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is subject to an annual review.

Approved by the JMQ Recruitment Limited board of directors.

21 June 2019

Joshua McQuillan, Director, for and on behalf of JMQ Recruitment Limited