

Modern Slavery and Human Trafficking Statement

Introduction

Impact Contracting Solutions Limited ('Impact') is committed to ensuring there is no modern slavery or human trafficking in our supply chain or in any part of our business. We are opposed to such worker exploitation in our direct operations, our indirect operations and our supply chain as a whole.

This statement is made in accordance with Section 54, Part 6 of the Modern Slavery Act 2015 and the Managing Director has overall responsibility for implementing and reviewing this statement, as well as monitoring the use and effectiveness of its content and proposals to eradicate modern slavery and human trafficking in Impact's supply chain.

Business

Impact is a contracting intermediary that operates in the temporary labour market in the UK. Impact employs 37 internal employees that work in our head office in Hull and a secondary office in Oldham. Impact supply temporary labour, engaged as employees, subcontractors and limited company contractors, to the warehousing, industrial and construction sectors primarily.

The following is a non-exhaustive list of policies and documentation that assist Impact with our approach to prevent modern slavery and human trafficking in our operations;

- o **Whistleblowing policy** – our whistleblowing policy provides a mechanism for our employees to report concerns within Impact

- o **Anti-slavery policy** – our anti-slavery policy demonstrates Impact's commitment to preventing slavery and human trafficking and sets out the steps in place with the aim of ensuring there is no worker exploitation in Impact's own business and supply chains. It educates our employees on the action to take if they believe or suspect that there has been a breach of the policy

- o **Equal opportunities policy** – our equal opportunities policy reflects our commitment to acting ethically and with integrity in all our business relationships

- o **Verification of identity and right to work** – we undertake Right to Work checks on our employees in line with the Home Office requirements

Supply Chains

Our business partners include, but are not limited to, our clients and subcontractors. We have detailed Terms of Business in place with our clients and subcontractors. Ultimately, we expect our business partners to promote the same standards within their own supply chains. Impact will never, knowingly, enter into a business relationship with any organisation involved in modern slavery or human trafficking.

As a contracting intermediary, the key areas of our operation that could be affected by modern slavery and human trafficking are our directly hired employees and subcontractors. Forced labour, servitude and trafficking of labour are key areas of consideration for us.

Our employees and those we work with are encouraged to challenge any unethical, dishonest or unacceptable behaviour. All concerns raised will be treated seriously and will be investigated with the relevant parties, without bias, with absolute discretion and appropriate action will be taken by the relevant party where required.

Due Diligence Process

All Impact's internal staff are trained on the due diligence procedures appropriate to high risk activity which could assist in identifying a case of modern slavery as detailed below.

Impact check the right to work documentation of employees to confirm legitimacy of their right to work in the UK. Relevant documents are inspected and photocopied and records are kept in line with the UK Home Office guidance. When appropriate, Impact's internal employees are trained to advise Immigration Enforcement of any issues with right to work documentation.

We operate a policy whereby if an employee or subcontractor wants to be paid through a bank account which is not held in their name, then we obtain written permission from both the employee/subcontractor and the account holder before making payment into the bank account. We also receive ID from both parties.

Limited company contractors must be paid through a limited company bank account. We undertake due diligence on all limited company contractors via a prescribed checklist drafted specifically for the engagement of limited company contractors.

On an ongoing basis, responsibility lies with the Managing Director to ensure that our processes, training and our understanding of the issues involved in modern slavery are kept up to date.

Next Steps

We understand that the risk of modern slavery is ongoing and so, we must continue to improve our processes in the years ahead, with particular focus on;

- Update Impact's training procedures on modern slavery including, but not limited to, how to identify the signs that a worker is potentially being exploited and what process to follow if potential issues surrounding modern slavery are identified. We will repeat this training annually and update it as necessary
- Include modern slavery training as part of the internal induction process
- Obtaining our clients' and suppliers' anti-slavery policies and, where applicable, their modern slavery statements so we can begin to assess where we can work together to combat modern slavery in our supply chain

We will be working with advisors from Aspire Business Partnership LLP who have been awarded with a Certificate in Investigating Modern Slavery by the Gangmasters Licensing Authority, in partnership with the University of Derby.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.



Mark Grierson

Managing Director

Date: 10 Oct 19