



<b>Company Name:</b>	City Resource Ltd (“the Company”)
<b>Model Policy Name:</b>	Modern Slavery Policy
<b>Date:</b>	July 2017
<b>Reviewed:</b>	July 2018 (minor alts to dates) July 2019 – no alts July 2020 – no alts July 2021 – no alts
<b>Version:</b>	1

### **Modern Slavery Policy**

1. City Resource Ltd is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. City Resource Ltd is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. City Resource Ltd provides appropriate training and awareness information for all of its staff. In particular:
  - Our recruiters, HR personnel, and/or staff involved in our procurement and supply chains undertake training that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
  - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to the HR Manager and/or Directors.
5. Reports surrounding these issues are taken extremely seriously by the Senior Management Team, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
  - Working with the appropriate organisations to improve standards,
  - Removing that organisation from our preferred supplier list,
  - Passing details to appropriate law enforcement bodies.

6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
  - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
  - The effectiveness of enforcement against suppliers who breach policies,
  - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
  - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
8. We would also recommend reading this in conjunction with our other policies, including our:
  - Ethical procurement policy,
  - Anti-bribery / corruption policy, and
  - Whistle-blowing policy.

This policy was reviewed on 31<sup>st</sup> July 2021 and was agreed by our Senior Management Team. It is reviewed annually.



## Modern Slavery Statement

This statement is made as part of City Resource Ltd's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how City Resource Ltd operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year December 2018 to November 2019. It was approved Senior Management Team on 31<sup>st</sup> July 2021.

Jeannette Elrick

Business, Finance & HR Manager

### 1 Our Business

City Resource Ltd is a limited company operating in the recruitment sector. We supply temporary workers in the Industrial and Driving sectors.

City Resource Ltd is an independent business.

#### 1.1 *Who we work with*

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies. Some of our work-seekers are supplied via other businesses, who facilitate providing them to the eventual hiring company.

The hiring companies that we work with are located in East Anglia and the East Midlands. The work-seekers / workers we supply live in East Anglia and the East Midlands.

#### 1.2 *Other relationships*

As part of our business, we also work with the following organisations:

- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com)) and the Institute of Recruitment Professionals ([www.rec-irp.uk.com](http://www.rec-irp.uk.com))

### 2 Our Policies

City Resource Ltd has a modern slavery policy available at [www.cityresourceltd.co.uk](http://www.cityresourceltd.co.uk).

In addition, City Resource Ltd has the following policies which incorporate ethical standards for our staff.

- **Anti-bribery and Corruption Policy**
- **Ethical Trading Policy**

- **Whistle Blowing Policy**

### **2.1 Policy development and review**

City Resource Ltd's policies are established by our Senior Management Team, based on advice from HR professionals, industry best practice and legal advice, and in consultation with the Recruitment & Employment Confederation. We review our policies annually, or as needed to adapt to changes.

## **3 Our Processes for Managing Risk**

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We require the businesses we work with to address modern slavery concerns in their policies.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.
- We work with the GLAA, REC and Immigration Department in order to combat the risk of modern slavery and human trafficking.

Our staff are encouraged to bring any concerns they have to the attention of management.

## **4 Our Performance**

As part of monitoring the performance of City Resource Ltd, we track the following general key performance indicators:

- Regular internal audits for Post Codes and Addresses
- Regular internal audits to ensure that each worker has their own bank account

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by Senior Management Team:

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We carefully consider our indicators, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

## **5 Our Training**

All of our staff receive training and support that is appropriate to their role. In particular:

- Our recruiters, HR personnel, and/or staff involved in our procurement and supply chains undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have and training is refreshed annually.