

MODERN SLAVERY POLICY

The MLT Group

Effective Date: 25th October 2024

Review Date: 25th October 2025

Approved by: Director

1. Policy Statement

The MLT Group has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically, with integrity and transparency in all business dealings and to implementing effective systems and controls to safeguard against any form of modern slavery within our operations or supply chains.

We are fully committed to complying with the **Modern Slavery Act 2015** and the **REC Code of Professional Practice**, and expect the same high standards from all of our employees, workers, suppliers, and business partners.

2. Scope

This policy applies to:

- All employees, contractors, and temporary workers
 - Candidates placed by The MLT Group
 - Suppliers and clients with whom we do business
 - Any third parties operating on our behalf
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3. Definition of Modern Slavery

Modern slavery includes:

- **Human trafficking**
- **Forced labour**
- **Debt bondage**
- **Domestic servitude**
- **Exploitation of vulnerable persons** (e.g., through threats or deception)

This applies to all workers, including those placed through third-party labour providers.

4. Our Commitments

We will:

- Conduct **robust due diligence** on all workers and clients
 - Ensure **legal right-to-work checks** are carried out for every candidate
 - Maintain clear and fair **employment contracts**
 - Ensure **temporary workers are not charged recruitment fees**
 - Train internal staff to identify and report signs of exploitation
 - Investigate and take action on any concerns or allegations of modern slavery
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5. Due Diligence in Recruitment and Supply Chain

To minimise the risk of modern slavery:

- We carry out **client audits** where appropriate, especially in high-risk sectors
 - Suppliers and contractors are required to confirm they comply with the Modern Slavery Act
 - We assess supply chain risk based on geography, industry, and nature of services
 - We include **anti-slavery clauses** in supplier contracts
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6. Reporting and Whistleblowing

We encourage all staff, workers, and third parties to report any suspicion of modern slavery or unethical practices.

- Reports can be made confidentially to:
Lei Turner
Lei.turner@themltgroup.co.uk
 - We protect whistleblowers under the **Public Interest Disclosure Act 1998**
 - Every report will be taken seriously and investigated promptly
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7. Training and Awareness

All staff receive training on:

- Identifying signs of modern slavery
- Reporting procedures
- Compliance with our obligations under the Modern Slavery Act

This is provided during induction and through annual refreshers.

8. Monitoring and Review

We review this policy:

- Annually
- After any reported incident
- In line with updates to legislation or guidance

The Compliance Officer is responsible for monitoring the effectiveness of this policy and ensuring all procedures are followed.

9. Responsibilities

- **Board of Directors / Leadership** – Overall responsibility for ensuring this policy complies with legal obligations
 - **Compliance Officer** – Operational responsibility for implementation and investigation of concerns
 - **All Employees** – Required to read, understand, and comply with this policy
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Signed: __M J Turner_____

Mitch Turner – Managing Director

Date: __25th October 2024_____