

## Policy Statement

This policy outlines Opus People Solutions commitment to eliminating modern slavery, human trafficking, forced labour and similar human rights abuse.

The company takes a zero-tolerance approach and is committed to acting ethically and with integrity in all business dealings and relationships to ensure 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 or similar human rights abuse.

Opus is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. Opus expects the same high standards from its customers, suppliers and workers and expects that its suppliers and customers will hold their own customers and suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity.

## General principles

The Modern Slavery Act will give law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims. It received Royal Assent on Thursday 26 March 2015.

### **Slavery, servitude and forced or compulsory labour**

- (1) A person commits an offence if—
  - (a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
  - (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.
- (2) In subsection [\(1\)](#) the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.
- (3) In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.

(4) For example, regard may be had—

(a) to any of the person's personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons;

(b) to any work or services provided by the person, including work or services provided in circumstances which constitute exploitation within section 3(3) to (6).

(5) The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

### **Human trafficking**

(1) A person commits an offence if the person arranges or facilitates the travel of another person ("V") with a view to V being exploited.

(2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).

(3) A person may in particular arrange or facilitate V's travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.

(4) A person arranges or facilitates V's travel with a view to V being exploited only if—

(a) the person intends to exploit V (in any part of the world) during or after the travel, or~

(b) the person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel.

(5) "Travel" means—

(a) arriving in, or entering, any country,

(b) departing from any country,

(c) travelling within any country.

(6) A person who is a UK national commits an offence under this section regardless of—

(a) where the arranging or facilitating takes place, or

(b) where the travel takes place.

- (7) A person who is not a UK national commits an offence under this section if—

- (a) any part of the arranging or facilitating takes place in the United Kingdom, or
- (b) the travel consists of arrival in or entry into, departure from, or travel within, the United Kingdom.

## Compliance and Reporting

The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of those working for Opus or under its control. All staff are required to avoid all activity that could be in breach of this policy.

You must notify your manager as soon as possible if you believe or suspect a breach has occurred or may occur.

You are strongly encouraged to raise concerns about any issue or concerns of modern slavery in any part of the business as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, you must raise it with your line manager.

Reports surrounding modern slavery are taken very seriously by the Board of Directors, who are committed to ensuring that all investigations are prompt and effective. If an investigation reveals 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 supply chain
- Passing details to appropriate law enforcement bodies

Opus People Solutions encourages openness and supports anyone that raises a genuine concern under this policy. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith, their suspicion of modern slavery.

Any employee who breaches this policy will face disciplinary action which may result in dismissal for misconduct or gross misconduct.

We have the right to terminate our relationship with any individual or organisation if they are in breach of this policy.

## Monitoring

We regularly monitor our risks in this area through use of relevant key performance indicators including audits, re-audits spot checks and due diligence.

### Responsibility

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that those under our control comply with it.

The Recruitment Operations Manager has day-to-day responsibility for implementing this policy, monitoring its use and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Line management are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate training.

This policy will be reviewed on an annual basis.