

# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

### Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Admiral Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Admiral has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place.

This Modern Slavery and Human Trafficking Statement sets down Admiral Groups commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking both in our own business and in our dealings with clients/supply chains. We all have a duty to be alert to risks, however small. Employees are expected to report their concerns and management to act upon them.

#### Structure and supply chains

This statement covers the business activities of Admiral Group which are as follows:

Recruitment of permanent and temporary staff predominantly in the Hospitality field but also in other areas including business relationships with other Recruitment agencies as well as clients.

The Company currently operates in the United Kingdom.

Admiral use a comprehensive right to work process and new starter process including gathering of information relating to equal opportunities monitoring, medical questionnaires and employee information.

#### Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company includes information and briefings as part of the onboarding process. The Company ensure that all clients and client agreements cover risks of modern slavery and human trafficking.

#### Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or in the business of our clients. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations

1. **Recruitment**. We operate a robust recruitment process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

- 2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or clients/supply chain, without fear of reprisals.
- 3. **Code of conduct**. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- 4. Ethics policy. Admiral is committed to the practice of responsible behaviour. Through its business practices the Company seeks to protect and promote the human rights and basic freedoms of all its employees and agents.

## Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes requesting slavery and human trafficking policies/statements building long-standing relationships with suppliers and making clear our expectations of business partners.

Admiral operates and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offences relating to modern slavery and conduct on site visits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- 1. They have taken steps to eradicate modern slavery within their business
- 2. They hold their own suppliers to account over modern slavery
- 3. They pay their UK employees at least the national minimum wage / national living wage (as appropriate)
- 4. We may terminate the contract at any time should any instances of modern slavery come to light

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Senior Management and Board of Directors endorse this policy statement and are fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Paula Rogers

Position: Managing Director

Date: 1<sup>st</sup> January 2017

Signature: