

## **Modern Slavery and Human Trafficking Statement July 2018**

### **Introduction**

This statement is made as part of Empiric's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Empiric 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.

### **Organisational structure and supply chains**

Empiric is a multi-award winning business and one of the fastest growing technology and transformation recruitment agency's specialising in data, digital, cloud and security. We supply technology and change recruitment services to businesses looking for both contract and permanent professionals. Our current Head office is located in UK.

### **Training**

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

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.

The policy also forms part of the Company handbook which is accessible to all staff and relevant stakeholders via intranet.

### **Policies**

Empiric is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships. Our policies on Whistleblowing, Sustainability, Health & Safety, and Anti-Bribery support our approach.

### **Due Diligence Processes for Slavery and Human Trafficking**

Empiric undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. 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.

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.
- 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.

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

## **Steps for the prevention of modern slavery**

In our efforts to monitor and reduce the risk of modern slavery occurring within our business and its supply chains, we have carried out:

A risk assessment to determine the level of risk of modern slavery posed to our business; and

A supplier risk assessment to identify if any parts of our business or our suppliers are at risk of modern slavery so that efforts can be focused on those areas.

In light of these assessments we have concluded that the risk of modern slavery occurring within our business and its supply chains is low.

## **Performance indicators**

Empiric uses numerous key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including;

- requiring all staff to complete training on modern slavery
- edibility to work
- national insurance
- personal data (proof of personal data)
- proof of bank account
- qualification checks
- reference checks
- employment checks

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary.

Any changes to this Modern Slavery and Human Trafficking Statement will be communicated to all staff and concerned stakeholders with necessary training to be provided where required.