



Anti-slavery and human trafficking policy

POLICY STATEMENT

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, office employees, temporary employees, suppliers and clients.

Coverstaff Ltd strictly prohibits the use of modern slavery and human trafficking within our operations. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our clients will hold their own suppliers to the same high standards.

COMMITMENTS

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our contractors, suppliers and clients to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out checks of contractors/clients for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

John Mann (Managing Director) has day to day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains. Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

APPROVAL FOR THIS STATEMENT

This statement was approved by the Board of Directors on 14th October 2016

Name (Director) – **John Mann**

Date 14th October 2016