



Modern Slavery Policy Statement

Version 9 – 01.07.2026

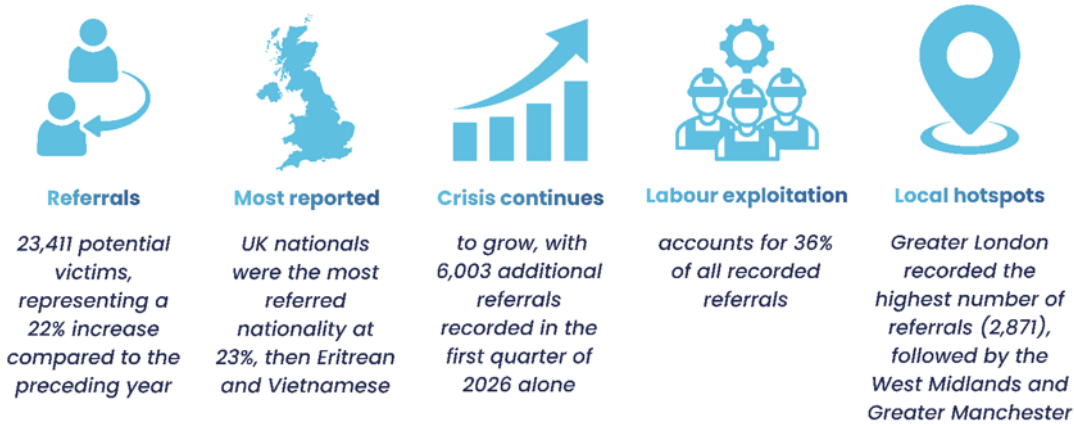


MODERN SLAVERY POLICY STATEMENT 2026

INTRODUCTION TO MODERN SLAVERY

Modern slavery can take many forms, including the trafficking of people, forced labour, servitude, and slavery. Any consent victims have given to their treatment will be irrelevant where they have been coerced, deceived, or provided with payment or benefit to achieve that consent.

The number of people identified as victims of modern slavery has been rising year on year. While it is impossible to know the full extent of modern slavery in the UK, the Home Office release data to demonstrate the numbers of people referred to authorities. The Company reviews the National Statistics each quarter upon release to identify any new areas of concern or consideration and to map our locations against the volume of NRM referrals so we know where additional measures and focus may need to be attributed. The 2025 statistics are the highest number of referrals since the records began in 2009 and demonstrate that:



This statement is made as part of The Company’s commitment to eliminating the exploitation of people under the Modern Slavery Act 2015. It summarises how The Company operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified, how we monitor them, how we train our staff, our commitments as an organisation, performance against previous years objectives, case studies and our current year objectives. This policy is applicable to all offices and operations within The Company structure and footer.

OUR BUSINESS

From a small independent staffing provider established in North Wales in 1998, gap personnel group has grown to be one of the largest recruiters in the UK. We’re now a team of almost 300 professionals working across more than 50 high-street branches and onsite client locations. When it comes to operational delivery we’re structured by specialism, supporting temporary, contract, and permanent requirements, across entry-level and semi-skilled roles through to technically skilled and professional placements. With a turnover of £206 million in 2025, we currently payroll up to 10,000 temporary workers each week and cover more than 2.5 million shifts each year. In 2025 we became part of R Capital’s strategic portfolio, which not only makes us a secure and sustainable choice for our customers but enables us to continue to actively invest in our customer solutions, enhancing our systems, process and products as we continue to grow.

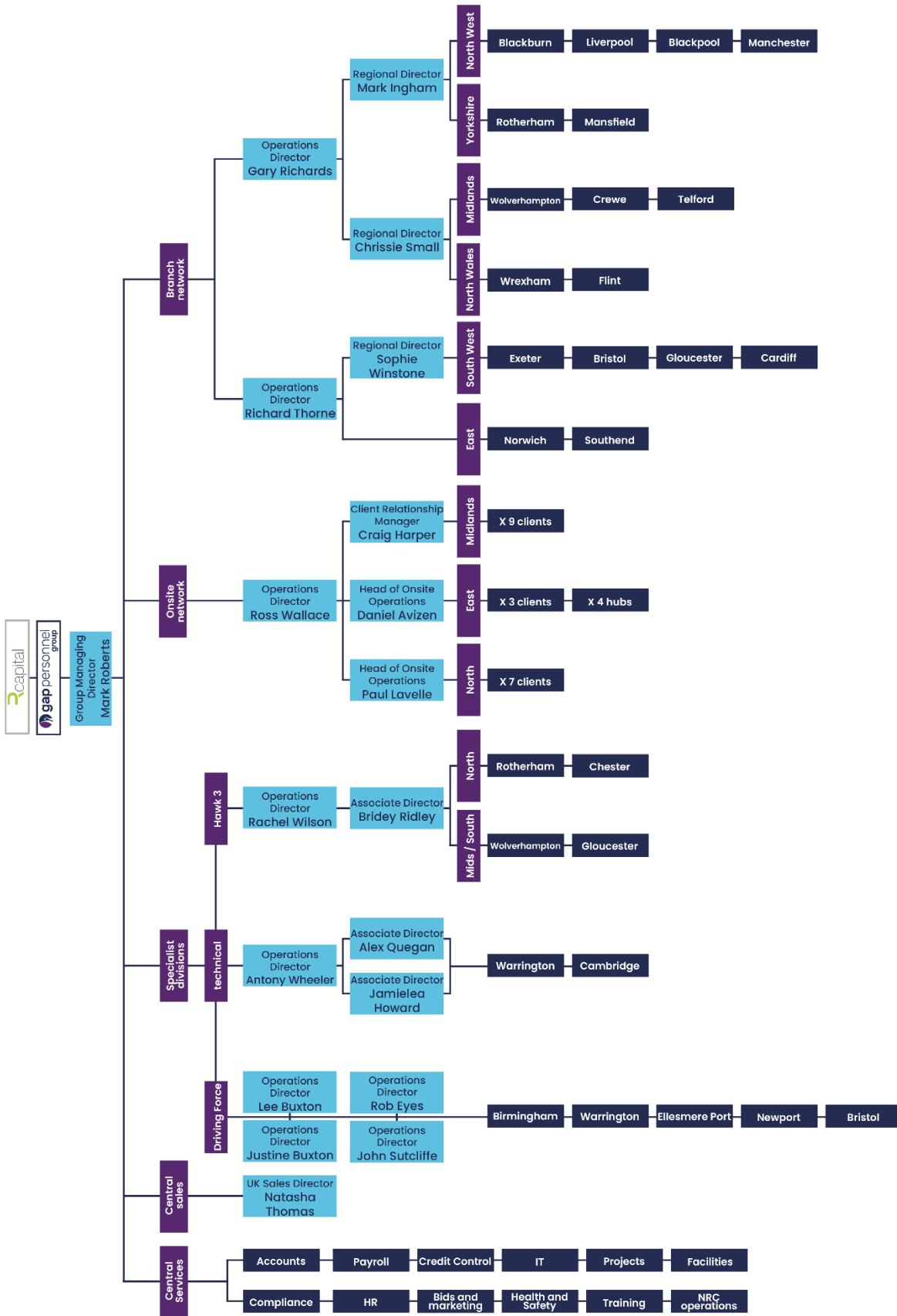
The sectors believed to be most affected by slavery and human trafficking are construction, agriculture, textile, security, and food processing and packaging, constituting much of The Company’s core business. As a leading recruiter in the UK operating within these key sectors, The Company realise that we are at the front line of the recruitment process and our position is key to raising awareness of modern slavery and tackling the problem of hidden labour exploitation. The Company are committed to developing and adopting a proactive approach to tackling hidden labour exploitation. Our clients range from market-leading multinationals through to SMEs and start-ups. All our clients, work seekers, and temporary workers, are known to, and identified by our staff during the client on boarding and candidate registration process as applicable.

MEMBERSHIPS, PARTNERSHIPS, ASSOCIATIONS AND CREDENTIALS

In recognition of the responsibility of The Company to our clients, candidates, employees and contractors, it is a fundamental value of The Company that all of its business and other practices be conducted at all times in compliance with all applicable laws and regulations of the countries in which it operates, its officiating bodies and associations. This is demonstrated by being GLAA licence holders (applicable to companies as detailed within the footer), working amongst the Compliance Intelligence Network CIN, which is a collaboration of Employment Businesses and Agencies within the UK with a shared focus to work together to help tackle modern slavery and assist in the rescue victims, and through our long-standing relationships with the following organisations:



COMPANY STRUCTURE



TACKLING MODERN SLAVERY AND HIDDEN LABOUR EXPLOITATION

The Company is committed to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

Modern slavery is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

Forced labour is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

Debt-bonded labour is where a person's labour is demanded as a means of repayment for a loan or service.

Human trafficking is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

Hidden labour exploitation is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

MANAGING RISK

We understand that conducting thorough practices and applying due diligence in advance of any engagements we enter into, whether they be with clients, applicants, our direct employees or third-party suppliers, is critical to managing the risk of modern slavery and hidden labour exploitation occurring within our business and/or our supply chains. All associated persons, affiliations and suppliers of The Company are expected to familiarise themselves with our Modern Slavery Statement and supporting policies and commitments and operate themselves in a manner which supports our methodology and vision of eliminating the exploitation of people under the Modern Slavery Act 2015 and ensuring this does not occur within our supply chain.

TRAINING

In line with our commitment to identifying any potential signs of modern slavery, forced labour or human trafficking, and ultimately preventing labour exploitation from occurring within our operation, we have sourced, developed and undertake the following training programmes:

Internal training

The Company recognises that its key resource is the people that it employs. We are committed to investment in our people, by providing training we aim to enhance performance and ultimately, productivity through empowerment to make the best use of an individual's natural ability.

- The initial training plan will be made up of in branch training, e-learning modules and attendance to classroom training for specific courses, including investigative interviewing skills sessions put together as a bespoke training package for The Company by former GLAA investigators;
- Included within the E-Learning training sessions is an interactive module on spotting the signs of Modern Slavery which is to be completed by all new starters and refreshed annually;
- All new starters are asked to commit to preventing labour exploitation by signing and agreeing to the 'Recruiter Compliance Principles' document viewable in The Companies Recruitment and Engagement Policy & Process handbook;
- All internal training courses are informally refreshed and updated as required to ensure the content remains current.

The aims of internal training are to:

- Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for to help spot potential cases;
- Upskill all staff responsible for directly recruiting workers in regard to investigative interview skills, critical to establishing a full understanding of an individual's background / journey which lead them to the recruitment service;
- Ensure that labour sourcing, recruitment and worker placement are under the control of trusted and competent staff members;
- Adopt a proactive approach to reporting suspicions of worker exploitation to the Fair Work Agency and the police.







External training

- Our Compliance Team members that specialise in Social and Ethical Compliance have attended "Tackling Modern Slavery in Global Supply Chains" and "Tackling Modern Slavery in UK Businesses" hosted by Stronger Together and "Modern Slavery in Business" and "Modern Slavery in Construction" hosted by Unseen;
- Regular attendance to ALP and Stronger Together Roadshows and/or webinars;
- External training is sourced and attended as required based on individual staff needs.

The aims of the external training are to:

- Ensure that our internal Compliance Team are up to date with current industry guidance and best practice processes so that they may effectively support our operational teams with situations that may arise;
- To identify new methods and processes that can be implemented into our business, ensuring a proactive approach to tackling modern slavery within our organisation and that of our supply chain.

COMMITMENTS

 <p>THE COMPANY</p>	<ol style="list-style-type: none"> 1. Designate appropriate managers from the internal compliance team to attend “Tackling Hidden Labour Exploitation” training and to have responsibility for developing and operating company procedures relevant to this issue. 2. Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. 3. Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third-party labour exploitation and signs to look for, having completed Modern Slavery training as part of our corporate induction process and having signed the appropriate Recruiter Compliance Principles policy document. 4. Delivery of annual refresher training across The Company network in relation to Modern Slavery, GDPR, Fraud Prevention, Health and Safety, Mental Health and Wellbeing, Equality and Diversity and unconscious bias. 5. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
 <p>WORKERS</p>	<ol style="list-style-type: none"> 1. Provide information on tackling “Hidden Labour Exploitation” to our workforce through the sending of Stronger Together leaflets as part of the onboarding process specifically contained within the ‘welcome email’ and displaying the Stronger Together posters in all of our offices and onsite operations. 2. Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately. 3. The safety and welfare of our workers is paramount to our business principles, as such, the below processes and practices have been designed, developed and implemented with the intention of ensuring our workers’ safety and welfare following placement with The Company and our clients. <ul style="list-style-type: none"> • Complete quarterly Common details checks across the workforce data to include, • Conduct quarterly Stronger Together questionnaires with all live workers • Conduct 150 face to face worker interviews annually by trained members of the Compliance Team
 <p>CLIENTS</p>	<ol style="list-style-type: none"> 1. Endeavor to consult with clients, identifying and providing any support, training, guidance requested in respect of the development or management of their own Modern Slavery programmes or Supply Chain Due Diligence activities. 2. Promote our Modern slavery Client Collaboration Strategy with key clients. A programme which seeks to cross reference ‘common details’ of clients directly employed worker records with our temporary worker records. This process will ensure modern slavery alerts from common details checks are maximised compared to each organisation completing their own in isolation. Significant work has gone into establishing how this can be achieved without any risk of breaching GDPR, we are hopeful clients will embrace this collaboration strategy.
 <p>SUPPLIERS</p>	<ol style="list-style-type: none"> 1. Our supply chain is categorised as High, Medium or Low risk, determined by the nature of the supplier’s business operation and the level of direct access to our workforce. Suppliers categorised as: <ul style="list-style-type: none"> • High Risk are those that have the most direct connection to or involvement with workers such as second tier labour suppliers. All High-Risk suppliers are required to undergo annual audits, where any issues or cause for concern are identified, further investigation and remedial actions will be taken, and a re-audit scheduled and completed. Failure to rectify issues identified and/or where the severity of the issues identify are deemed necessary, supplier arrangements will be ceased without notice. • Low risk - Annual circulation of mailers about How to become a Stronger Together Business Partner to increase knowledge and awareness at this level. 2. Our full Supplier Due Diligence process will be shared with employees as part of our internal training process and externally with clients and/or suppliers as part of an audit process. The Company will not use any individual or organisation to source and supply workers where they: <ul style="list-style-type: none"> • Have not been signed off by the central compliance team following successful completion of The Company Supplier Due Diligence Process; • Do not hold a valid gangmasters licence, save where a valid gangmasters licence exemption is approved by the central compliance team; • Have not confirmed that workers are not being charged a work finding fee. 3. Regularly review our supplier due diligence process and audit process, implementing any additional processes as identified within the review.
 <p>EXTERNAL BODIES</p>	<ol style="list-style-type: none"> 1. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Fair work Agency and police. 2. Consistently seek to create new partnerships to join together to tackle modern slavery, share intelligence where permitted and strengthen our network to identify, assist and support victims of modern slavery. 3. Establish relationships with anti-slavery organisations / charities to further strengthen The Company’s knowledge, exposure and continued education on the topic and strategy of tackling modern slavery;
 <p>INNOVATIONS</p>	<ol style="list-style-type: none"> 1. As a front-line Recruitment Agency, we acknowledge that we are in an ideal position to identify alerts of modern slavery. Through innovation and investment of our dedicated CRS software The Company has automated a number of processes to effectively complement our detailed practices. Technology combines facial recognition and DVS technology, financial and fraud checks, with further developments planned to incorporate dynamic interview questioning, providing escalations of alerts to relevant team members, enabling the identification of potential victims early on within our recruitment process into reducing the exposure of our business to instances of modern slavery.

2025 PERFORMANCE AGAINST MODERN SLAVERY OBJECTIVES

The company objectives for 2025 – 2026 financial year and performance against those is indicated below (∞ indicates an objective that is still in progress):

- ∞ Continued investment into further development of our Candidate Registration System (CRS). Implementing the dynamic interview questioning which could not be achieved for the initial implementation to enhance the current mechanisms in place to identify potential modern slavery victims during the onboarding process.
- ✓ To review our operational network locations against Modern Slavery hotspots to support strategic determination of areas in need of additional training and/or audit measures being implemented.
- ∞ Appoint a Modern Slavery Champion under the S2G advanced Business Partner Commitments who will be responsible for providing additional training to staff in those areas determined as hotspots and host a quarterly meeting to discuss any issues, any concerns, any local intelligence or knowledge that should be shared.
- ✓ Host 3 Modern Slavery Seminars in support of Anti-Slavery week. These will be made available for our existing and prospect clients as well as our High-Risk suppliers to increase awareness and strengthen the safety of workplaces to which our workers are supplied as well as placing a spotlight on our chosen Modern Slavery charities and organisations.
- ∞ Complete a minimum of 12 volunteer days for our chosen anti-slavery organisations / charities across the UK.
- ✓ Launch our Modern slavery Supplier Collaboration Strategy with High-Risk Suppliers. A programme which seeks to cross reference 'common details' of High-Risk Suppliers worker records with our temporary worker records. This process will ensure modern slavery alerts from common details checks are maximised compared to each organisation completing their own in isolation. Significant work has gone into establishing how this can be achieved without any risk of breaching GDPR, we are hopeful clients will embrace this collaboration strategy.

2025 KEY STATS

Key Stats from The Company's performance and activity in 2025 include:



Reported in excess of 100 imposters attempting to gain work illegally across the business



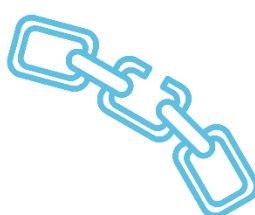
Delivered an external webinar on right to work checks and Imposter switching to current/potential clients



Senior Compliance Team members presented "Enabling effective cross-organisational collaboration" at Stronger Together's 2025 Anti-slavery event



PIWA and Ethical compliance manager completed 7 external training courses in Modern Slavery/Responsible Recruitment to successfully achieved 'Advanced business partner' status for Stronger Together and Responsible recruitment



Trained 45 internal new starters on spotting the signs of Modern-Day slavery



Provided refresher training to over 200 internal employees on Modern-Day slavery

CASE STUDIES & HIGHLIGHTS

Case Study - Anti-Slavery Week Webinars

One of The Companies 2025 Modern Slavery Statement objectives was to Host 3 Modern Slavery Seminars in support of Anti-Slavery week. Our aim was to use our platforms and connections to increase awareness and strengthen the safety of workplaces to which our workers are supplied, as well as placing a spotlight on our chosen Modern Slavery charities and organisations.

We were fortunate enough to be joined by leading organisations delivering insights, case studies and real stories on preventing, tackling and responding to Modern Slavery. These events were made available, free of charge, for our existing and prospect clients, our High-Risk suppliers as well as the wider public via our social media networks.



Following on from the success of the webinar and the positive feedback received from attendees and our clients has encouraged us to expand this concept into our 2026 objectives and extend the offering on other important topics such as right to work and the prevention of illegal working given the significant changes pending in 2026/2027.

Case Study - Networking and Collaboration “We all have a role to play”

Members of our compliance Team were privileged with the invitation to speak at Stronger Together’s Modern Slavery Champions, 2025 Business Partners and the Greater Manchester Modern Slavery Business Network. It was a brilliant event, which offered some key learnings for attendees:

1. Effective collaboration- share best practices, new information and available resources with peers, colleagues and external stakeholders
2. Place modern slavery as a priority in every meeting, there is always more that can be done
3. Keep educating people on knowing what signs to look out for, and the importance of raising awareness.
4. Embed lived experience consultant expertise across your policies and processes. Treat their involvement as an ongoing opportunity rather than a box ticking exercise
5. Strategic partnerships can enhance capabilities, increase reach and drive results

Our team spoke about the types of challenges experienced with cross organisational collaboration in relation to modern slavery prevention and took a deep dive into the topic of common details checks. Common Details checks are standard practice in most organisations. They are one of the fundamental building blocks of any Modern Slavery Strategy, however they are almost always conducted in isolation by each organisation. In the knowledge that many instances of modern slavery has occurred with criminal gangs infiltrating both the end client and the employment business/businesses in the supply chain, this being an isolated function provides a loophole, a grey area, where criminal gangs will thrive and exploitation occur.

Having a process for cross-organisational collaboration actually features as a specific point within the S2G Labour Provider Good Practice implementation checklist. Establishing a procedure that spans the entirety of the labour supply chain is critical to identifying and eradicating modern slavery within that supply chain. Our experiences show that effective collaboration on this matter is inherently hindered by GDPR. 2 years ago we launched our client collaboration strategy in respect of common details checks which enables cross-organisation collaboration to be achieved and the hindrances presented by GDPR overcome.

Navigating GDPR legislation to establish a sound strategy was certainly challenging. As such the key consideration for us when establishing this strategy was ensuring a route to maintaining the data protection, security and human rights of the Employment Business workers, 2nd Tier Labour Provider workers and Clients direct employees by strategically sharing data in a staged process, exchanging minimal information in the first instance that would not release the identity of any individual but would be sufficient to identify an initial alert, upon which an additional set of data will be shared to confirm the alert or rule out the alert. All data being shared through a dedicated and secure platform e.g sharepoint. Outcomes of alerts to then be investigated and then all data deleted upon completion of the activity once concluded.

The team demonstrated to attendees practical methods which could be implemented to navigate the challenge of completing common details checks across both a hirer and labour providers supply chain data, in the hope that more organisations would adopt the methodology and implement within their own supply chains.

Highlight - REC Award Winners 2025 – Demonstrating High standards in Recruitment Award

The Compliance Team having established thorough policies and processes which have demonstrated consistently high results and positive acknowledgment from our workers, clients, association bodies, achieving winning status of national industry awards in 2018 and now again in 2025. Collectively our teams seek to implement objectives and strategies which will produce tangible, positive impacts on the prevention of Modern Slavery across our client and supplier network, our operational teams are critical in delivering against the high standards, policies and processes established and our product team are focused on developing systems to effectively support them.



Pictured:

Brian Halstead (Product Owner), Simone Blackburn (Compliance Team), Holly Wakefield (Compliance Team), Jade Price (HR Team), Lisa Meredith (Compliance Team), Claire Roberts (HR Team), Georgia Rowe (HR Team), Jessica George (Marketing Team) and Susan Cross (Marketing Team) representing gap personnel group.

As a prominent UK industrial labour provider, gap personnel group has built its reputation on ethical recruitment practices. With the enforcement of strict policies against modern slavery, mandating of regular compliance training for staff, and prioritizing transparent worker welfare to protect candidates from exploitation. The culture and ethos of our business is centred around our I-CARE values, and each one of these can be seen in our strategy and future objectives towards the prevention of modern slavery.

INNOVATIVE

Innovation is our mindset. We constantly seek smarter ways to work, improve, and lead. Feedback isn't just welcomed—it's actively encouraged. We use 360° input to spot opportunities for growth and elevate our standards across every core value.

CONSULTATIVE

We put people first—but that doesn't mean saying yes to everything. We listen deeply, ask the right questions, and offer honest advice, even when it's tough. Our goal is to understand customer needs fully and exceed them wherever possible.

ACCOUNTABLE

Accountability is built into our culture. We define expectations clearly, train our teams thoroughly, and hold ourselves to high standards. Everyone knows what good looks like—and aims to get it right the first time.

REAL

We work nationally, but we connect locally. Our conversations are honest, our relationships are human, and our service is constantly reviewed for improvement. We spot risks, fix issues, and build trust through transparency and action.

ETHICAL

We have lots of compliance processes in place to safeguard the welfare of our workers, but more it's more than that - we promise to always be totally transparent.

2026 – 2027 MODERN SLAVERY OBJECTIVES

The below are The Company objectives for 2026 – 2027 financial year. These are objectives over and above our standard company commitments, which demonstrate our ICARE values and desire to further strengthen our approach to tackling Modern Slavery:

1. Continued investment into development of our Candidate Registration System (CRS) which will see:
 - the extension of post registration features and the implementation of an enhanced Worker Welfare strategy, including facial recognition technology to support the identification of 'imposters' infiltrating the organisation / supply chain post registration and interview. Following verification of identity, Stronger Together and worker welfare questions being asked and answered with alerts escalating to the Modern Slavery Champion to investigate.
 - The implementation of change of details processes contained within the CRS functionality which will
2. To review our operational network locations against Modern Slavery hotspots and monitor high risk demographics based on NRM referrals, to support strategic determination of areas in need of additional training and/or audit measures being implemented.
3. Appoint a Modern Slavery Champion under the S2G advanced Business Partner Commitments who will be responsible for providing additional training to staff in those areas determined as hotspots and host a quarterly meeting to discuss any issues, any concerns, any local intelligence or knowledge that should be shared.
4. Introduce measured charitable initiatives which will have a direct benefit to the society in which we live and work and help to ensure victims of modern slavery can develop their confidence and experience healthy, positive workplace and employment.

OVERVIEW

As a responsible corporate business, The Company aim to act in a socially responsible manner at all times, by respecting the economic, social, cultural, political and civil rights of those employed through our business, and by complying with human rights legislation and the Modern Slavery Act 2015. Since the publication of our previous Modern Slavery statements, The Company internal Compliance Team have made several changes to their training, systems, audits and standard business practices which have strengthened our operational understanding, awareness and process relating to modern slavery. Additionally, they have developed links with various external bodies and government authorities to ensure industry issues including illegal working prevention and labour exploitation are effectively managed and escalated where required.

We are proud upon publication of our 2026 statement to be able to demonstrate the effectiveness of the processes we have introduced into our business in relation to tackling modern slavery, human trafficking and forced labour exploitation. The successful identification of several cases of potential exploitation reinforces the dedication and commitment of our teams to tackling modern slavery. As a business, we are committed to continuous improvement and strive to identify new methods, processes and practices that can be incorporated into our business operations, ensuring the health, safety and welfare of our workforce. The commitment is demonstrated by the significant financial investment made towards the development of our Candidate Registration System, for which we have more plans and investment allocated to further develop features which aim to identify and prevent modern slavery risks within our business.

In conclusion, this years Modern Slavery Statement, associated policies, processes, case studies and highlights reflect a proactive, collaborative, and continuously evolving approach to tackling modern slavery. Through initiatives such as industry-wide knowledge sharing, innovative cross-organisational collaboration, and investment in awareness and education, the business is demonstrating not only compliance but leadership within the sector. The recognition of its efforts through national awards further reinforces the effectiveness of its policies, systems, and values-driven culture. While challenges such as data protection and supply chain complexity remain, the organisation is committed to overcoming these through innovation, partnership, and transparency. Guided by its I-CARE values, the company will continue to strengthen its practices, expand its impact, and play an active role in driving meaningful change in the prevention of modern slavery.



Mark Roberts
Managing Director
01/07/2026