

Modern Slavery Statement 2024-25

Slavery, servitude, forced labour and human trafficking (modern slavery) are issues of increasing global concern, affecting all sectors, regions and economies. Modern slavery is fundamentally unacceptable within our business and the supply chain, and is a key focus in our overall approach to business and human rights.

Thomas March Group is committed to respecting, protecting and championing the human rights of all those who come into contact with our operations, including employees, temporary workers, customers and local communities. We accept our responsibility to support transparency and honesty; to find and resolve problems, and to work with others to protect the rights of workers, particularly those who are most vulnerable to abuses such as modern slavery.

This statement has been published in accordance with the Modern Slavery Act (2015). It sets out the steps Thomas March Group will take during the year, ending 30th April 2025 to prevent modern slavery in our business operations and supply chains.

Business Structure & Supply Chains

The Group offers a diverse portfolio of people-based services, from high volume flexible staffing solutions, permanent recruitment, bespoke training services, HR & H&S expertise, and compliance & governance. Thomas March Group consists of industry leading organisations, benefiting from over 3 decades of experience and boasting industry expertise in each respective field.

- Nexus Workforce Limited
- Assist Resourcing Limited
- Ignition Driver Recruitment
- Flow Logistics
- Centric Talent
- Touchstone HR Services

The Group has an annual turnover of £145m, its headquarters are based in Brighouse, West Yorkshire. Operating mainly in the industrial and driving sectors, we have different delivery models to provide people solutions to Labour Users, specifically in temporary labour. Operating across the UK, we employ and assign thousands of temporary workers a week at any one time.

We do not operate outside of the EEA. We do not use labour supply agencies, or second-tier agency suppliers.

Policies & Contractual Controls

Thomas March Group has several policies and controls which govern our modern slavery statement, of which all employees, suppliers and business partners are required to adhere to. Our board of directors champion our internal policies, and work closely with the HR & Compliance department to review, improve and adapt to changes:

- Anti-Slavery and Human Trafficking Policy: sets out our zero-tolerance approach to modern slavery and our commitment to acting ethically and with integrity in all our

business dealings and relationships.

- **Human Rights & Ethical Trading Policies:** we highly value our people, in all elements of the business and operate to compliance with the Sedex code of ethical compliance. These policies set out of commitment to ensure employment is freely chosen, rights to collective bargaining are respected, working conditions are safe and hygienic, child labour is not used, living wages are paid, working hours are not excessive, no discrimination is practiced, regular employment is provided and no harsh or inhumane treatment is allowed.
- **Terms of Business and Corporate Responsibility:** we guarantee an employee's weekly pay regardless if we have been paid by the end client within the supply chain. We always act ethically and will not withhold a payment to an employee or supplying business unless we suspect fraudulent or suspicious activity. The business work in partnership with our customers to ensure our rate structure is competitive and at market standard within the UK. Our charge rates confidently reflect ENI, holiday pay, pension, apprenticeship levy and margin, ensuring the workers receive a true National Living Wage. Our suppliers and business partners are vetted to ensure standards are met to our anti-slavery policies, which our compliance team monitor regularly.
- **Whistle Blowing Procedure:** the group acts to embed a culture of trust where workers are valued and treated with dignity and respect and can raise issues without fear of retribution. We have an independent, external whistleblowing line on hand to take incoming calls or concerns from our employees and business partners.
- **Employee Welfare:** The welfare of our employees and contractors is paramount. We have a multi-lingual team across each of our brands to ensure we are able to communicate openly and effectively with employees. We have embedded a friendly and approachable culture, which supports potential victims to feel comfortable in coming forward to our front line, and senior management teams.
- **Diversity, Inclusion and Equal Opportunities:** Thomas March Group is committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination. The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.
- **Responsible Recruitment:** We are committed to ensure all workers within our operations and supply chains are recruited, ethically and have a fair work free from exploitation. The commitment to develop and adopt a proactive approach to prevent, respond and remediate labour exploitation risks. The protections that apply to all workers throughout their application, recruitment, subsequent employment and after it is finalised.
- **Anti-Bribery and Corruption:** This policy outlines the organisation's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The organisation will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Our policies are communicated throughout the business, and within the supply chain.

Thomas March Group is a member of Stronger Together, a business-led multi-stakeholder initiative working to reduce modern slavery, particularly hidden forced labour, labour trafficking and other third-party exploitation of workers. We use their expertise and resources to support us in implementing policy and control within our operations. We commit to the Stronger Together standards ensuring:

- No forced labour
- No child labour
- No recruitment fees are paid by workers
- Job information is accurate and transparent and employment status are appropriate
- All workers are properly recruited and registered and legal eligibility to work is established
- Wages and benefits are paid fairly and properly
- Regular work is offered and working time is not excessive
- Work conditions are safe and hygienic
- Accommodation and transport are safe and hygienic
- Freedom of association is respected
- Opportunity and treatment are fair, equal and dignified
- Termination rights are provided
- Access to remedy is ensured and a worker-centred culture is promoted
- Ethical and professional business conduct

Due Diligence & Managing Risk

We recognise that there is a risk of modern slavery in our supply chain in the following areas, where there is a reliance upon low-skilled or unskilled labour:

- Logistics, warehousing and transport
- Food processing
- Manufacturing
- Particularly, in the following groups:
 - Displaced persons forced to migrate because of war or persecution
 - Migrant workers, particularly those without legal eligibility to work, whose vulnerability can be exploited through coercion
 - Young people, lower skilled workers or those without access to education who may be less aware of their legal rights
 - Women workers – 59% of workers in forced labour exploitation are women
 - Those with limited or no English language

We continue to monitor, evaluate and address any risk of modern slavery through the following methods:

- The business directors are explicitly accountable for ensuring ethical labour standards are applied and for protecting the human rights of those working in the business and has an appointed Head of HR & Compliance, to lead the implementation of operational due diligence steps to reduce and address the risks of modern slavery and hidden labour exploitation. The roles and responsibilities of recruiters and consultants in spotting the signs of exploitation and how to handle and report suspected cases have been explicitly defined and communicated to them.
- We have a robust grievance procedure to ensure proper handling of serious issues at

work. This includes issues such as violence, abusive behaviour, bullying, bribery, corruption, discrimination, harassment, victimisation, modern slavery, and hidden labour exploitation. This provides a trusted communication method which links directly to our HR department through our management team.

- We display Modern Slavery posters either branded by the GLAA, Stronger Together or Nexus People across all branches and on-site warehouses (including in private areas such as toilets, canteens and locker rooms) to raise awareness. In addition, we include modern slavery awareness in the onboarding process, where we have high risk groups as above.
- Operating recruitment good practice and to prevent imposters, we ensure all candidates have right to work in the UK, verifying the person presenting is the person in the identity documents, confirming applicants have control over their own identity documents, understanding how the applicant found out about the job and if through someone else, ensuring the applicants have not paid anyone, or will not have to pay anyone to obtain the job.
- We strive to have a long standing settled workforce to improve welfare and relationship building with our account management team and continue to develop our engagement practices to sustain a productive workforce.
- We have a clear procedure and escalation process to ensure effective remedy where we suspect exploitation, or modern slavery. Ensuring we do not engage with the potential exploiters or otherwise act in a way that could damage evidence, alert offenders or undermine a criminal investigation. Relevant managers understand who, how and when to contact the GLAA, Modern Slavery Helpline, Crimestoppers and/or the Police (emergency and non-emergency) in which situations when there are potential indicators of forced labour and how to be best prepared to provide the information.
- Our HR department hold regular “HR Surgeries” at each of our client warehouse locations which allow individuals to speak to HR on a confidential basis, at a time that suits them, raising any issues or concerns to improve worker welfare. In addition to this, the team also do floor walk arounds which allow workers to speak to HR on an informal basis, building a relationship with each worker to encourage day to day discussions
- On a weekly basis, we examine a report that determines where we have duplications in our employee records. We particularly look for where workers are sharing living arrangements, telephone numbers, and next of kin details. Our sites are also tasked to detect multiple occupancy during a registration or interview session with workers and highlight this to the HR department immediately. If we determine an employee to be “high risk” we conduct a Modern Slavery Risk Assessment, which is completed by our on-site team. This assessment is also used in any instances where we feel we need to investigate potential cases of modern slavery
- We work closely with our clients, at senior manager level ensure we effectively mirror our policies and processes to prevent labour exploitation, and exploitation of any kind. Indicators of harassment, bullying, discrimination are acted on quickly and effectively with the support of our clients to drive fair and equal practices.
- Thomas March Group has implemented a comprehensive auditing regime. All branches and on-site contracts are audited on a regular basis by the central HR and Compliance Team to ensure adherence to the ETI base code, contractual requirements industry good practice and legislative standards. Internal audit results are presented to the Board of Directors. In addition, we are audited regularly by our clients and furthermore, contribute to our client’s own supply chain audits.
- The business work in partnership with our clients and suppliers to ensure our rate structure is competitive and at market standard within the UK. Rates are determined based on the job availability within the area, local competitors and industry standards

factoring all aspects of a charge rate (e.g. ENI, Holiday Pay, Auto Enrolment, Levy, Margin). We always pay the national living wage.

As a group, we can demonstrate that increases in labour demands from clients such as during seasonal peak periods do not impact on the delivery of good practice during recruitment.

Focus for this year:

We aim to bolster our remediation policies and procedures, through implementing a Remediation Team. The team will receive advanced training on supporting victims of exploitation, and the company response procedure. The team will play an important role in building relationships with local NGO's and migrant support groups, to better our practices. The Remediation Team will also be responsible for conducting regular Scenario Modelling/Incident Testing exercises to test how effective our "Response Plan" would be in a simulated real life situation and to implement improvements from these.

Relevant managers, the Remediation Team and consultants who may be immediately faced with potential victims of exploitation will be trained to respond with a "People Centred Safeguarding" approach when faced with serious workforce issues. They will gain an understanding of the requirement to risk assess and consider their actions very carefully and be aware that what they say and do may impact directly on people's lives including their own, potential victims and other employees' safety.

Our HR team will be developing a "Workplace Critical Issues Report" that will be used to assess investigations into serious workforce issues, including modern slavery and hidden labour exploitation.

We will look to progress our engagement activities, with the workforce, to ensure that the risks and responses to hidden labour exploitation and modern slavery are kept current and live. In doing this, we will have on-site 'welfare officers' who will be responsible for conducting practice checks, for all welfare matters. Welfare Officers will receive advance HR training, to effectively carry out their duties, ensuring confidentiality and a neutral approach. The Welfare Offices will work with our customers to develop confidential routes to escalating concerns, or workplace issues, through means of a suggestion box.

Training

Our management team, and key consultants have attended a Stronger Together full day workshop covering slavery and human trafficking, how best to prevent, report and highlight signs of exploitation.

All operations staff have received training on exploitation and slavery, delivered by our HR manager, specifically on how to spot the signs and how to raise concerns within senior managers, including the complaints procedure and whistleblowing procedure.

Our company directors are the main drivers of all our internal policies and are therefore integral in driving the Anti-Slavery and Human Trafficking policy. The directors ensure the training conducted by the HR and operational team is of excellent standard for our permanent and temporary employees.

As a Group, we are committed to ensuring that we uphold the highest standards of responsible recruitment practices and vigilance to protect our valued employees from any exploitation.
Regards,



Yasmin Harrison
COO
Thomas March Group