

Modern Slavery and Human Trafficking Policy and Statement

Easy Talent Ltd · Statement period 1 April 2025 to 31 March 2026

Document	Modern Slavery and Human Trafficking Policy and Statement
Version	2.0 (supersedes version 1.0, 2025)
Applies to	All directors, employees, contractors and agency workers of Easy Talent Ltd, and all workers supplied by Easy Talent Ltd to clients
Approved by	Louis Borhani, Director, on behalf of the Board of Easy Talent Ltd
Date of approval	13 October 2026
Next review	October 2027, or earlier if legislation, our operations or our supply chain change materially

1 Purpose and scope

Easy Talent Ltd is a recruitment business supplying temporary, permanent and contract staff into catering and hospitality roles, including schools, academy trusts, nurseries, care homes, hospitals, the public sector, hotels, restaurants, venues and events.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms — slavery, servitude, forced and compulsory labour, and human trafficking — all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This policy sets out the steps Easy Talent takes to ensure that modern slavery is not taking place in any part of our business or supply chain. It applies to every person working for us or on our behalf in any capacity, and to every worker we supply.

Basis of publication. Easy Talent Ltd falls below the £36 million annual turnover threshold at which section 54 of the Modern Slavery Act 2015 imposes a mandatory reporting duty. We publish this statement voluntarily, having regard to section 54, because the clients we serve in education, care and hospitality are entitled to see the standard we hold ourselves to before they place workers on their sites.

2 Our commitment

Easy Talent Ltd is committed to eliminating modern slavery, human trafficking, forced labour and related human rights abuses. We have a zero-tolerance approach, and we expect the same standard of everyone we work with.

We are committed to ensuring that our staff, and any workers we supply directly or indirectly, are not subject to behaviour or threats amounting to modern slavery, human trafficking or forced labour. We act with integrity in all our business relationships, and we implement and enforce effective systems and controls to guard against exploitation anywhere in our own business or our supply chain.

3 Our business and our supply chain

Our supply chain is short and predominantly domestic. It consists principally of:

- work-seekers who register with us directly and are supplied to our clients as temporary or permanent staff;
- client organisations to whom we supply those workers;
- service providers supporting our operations, including payroll, background screening, training and software providers.

We recruit the majority of our workers directly. Where we rely on any third party to source, introduce or pay workers, that relationship receives additional scrutiny, because intermediated labour supply is where the risk of exploitation in our sector is concentrated.

4 Risk assessment

We have assessed where the risk of modern slavery arises in a business like ours. Temporary labour supply into catering, hospitality and facilities roles carries recognised risk factors, and we treat the following as our principal areas of concern:

- workers recruited through third-party agencies, introducers or informal networks rather than registering with us directly;
- workers with limited English, insecure immigration status, or limited understanding of their rights in the UK;
- control of a worker's wages, documents or accommodation by a third party;
- any arrangement in which a work-seeker is asked to pay a fee in order to obtain work;
- intermediaries in the payment chain, including umbrella companies and payroll intermediaries;
- low-paid, high-turnover roles filled at short notice, where normal checks may come under time pressure.

5 Due diligence and controls

The following controls apply to our recruitment and supply activity.

Worker-facing controls

- **Identity and right to work.** We verify the identity and right to work of every worker against original documents, or by an approved digital identity verification route, before placement.

- **We never charge work-seekers a fee for finding or seeking to find them work**, in line with the Employment Agencies Act 1973 and the Conduct of Employment Agencies and Employment Businesses Regulations 2003.
- **Direct contact.** We register and interview work-seekers ourselves. We do not accept candidates introduced in bulk by an unverified third party.
- **Payment to the worker.** Wages are paid directly into an account in the worker's own name. We check for duplicate bank details and duplicate addresses across our worker records, as these are recognised indicators of controlled or exploited labour.
- **Documents remain with the worker.** We never retain a worker's original identity documents.
- **Terms in writing.** Every worker receives written terms, a Key Information Document setting out pay and deductions, and a named consultant they can contact.

Supply chain controls

- We expect our suppliers and any labour providers to operate to standards consistent with this policy, and to be able to evidence it on request.
- We take account of a supplier's own modern slavery statement, policies and sector registrations when assessing them.
- We reserve the right to terminate our relationship with any supplier or client found to be in breach of this policy.

6 Training and awareness

Easy Talent provides training and awareness information to all of its staff, proportionate to their role.

- Recruiters, HR personnel and staff involved in procurement or supply undertake training covering modern slavery and human trafficking, the indicators of exploitation, and wider human rights issues.
- All staff receive awareness information so that they can recognise the signs of modern slavery and raise concerns with management.
- Training is refreshed periodically and on any material change to our operations or to the law.

7 Raising a concern

Any member of staff, worker, client, supplier or other party is strongly encouraged to raise any concern or suspicion of modern slavery, however small or uncertain it may seem. You do not need to be sure, and you do not need evidence. It is always better to raise it.

Internally, in the first instance	Your consultant, your branch manager, or any Director of Easy Talent Ltd
By email	enquiries@easytalentgroup.com
By telephone	0207 940 2000
Modern Slavery & Exploitation Helpline	08000 121 700 (confidential, 24 hours)
Gangmasters and Labour Abuse Authority	0800 432 0804
In an emergency, or if someone is in immediate danger	999

No one who raises a genuine concern in good faith will suffer any detriment as a result, even if the concern turns out to be mistaken. Reports may be made anonymously. Victims of modern slavery are treated as victims, not as offenders.

8 How we respond

Reports are taken extremely seriously by the Board. We are committed to ensuring that every investigation is prompt, proportionate and effective. Where an investigation identifies an issue, we will take appropriate action, which may include:

- removing a worker from a placement and safeguarding their position while matters are investigated;
- working with the supplier or client concerned to raise standards, where there is a genuine commitment to improve;
- suspending or terminating a commercial relationship;
- referring the matter to the Gangmasters and Labour Abuse Authority, the police, or another appropriate law enforcement body;
- supporting any affected individual to access specialist support.

9 Measuring effectiveness

We monitor our performance in this area using the following indicators. We review them at least annually as part of the review of this policy.

- The proportion of suppliers and labour providers who have signed up to our standards or provided their own modern slavery statement.
- The proportion of workers supplied who were recruited and vetted directly by Easy Talent.
- The number of concerns raised, the time taken to respond, and the outcome of each.
- Completion rates for modern slavery training across our staff.
- The results of duplicate bank account and address checks across our worker records.
- The time spent on audits, re-audits, spot checks and related due diligence.

10 Related policies

This policy should be read alongside our other policies, including:

- Safeguarding and child protection policy
- Whistleblowing policy
- Anti-bribery and corruption policy
- Equal opportunities and diversity policy
- Data protection and privacy policy
- Ethical procurement policy

11 Modern Slavery Statement

This statement is made as part of Easy Talent Ltd's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015. It summarises how Easy Talent operates, the policies and processes we have in place to minimise the possibility of exploitation, the risks we have identified and how we monitor them, and how we train our staff.

It is published voluntarily, having regard to section 54 of the Act, and relates to the financial year 1 April 2025 to 31 March 2026.

During the period covered by this statement, Easy Talent Ltd continued to recruit the substantial majority of its workers directly, to verify identity and right to work before placement, to pay workers directly rather than through intermediaries, and to charge no fee to any work-seeker. We will publish a further statement for each subsequent financial year.

12 Approval and review

This policy and statement was approved by the Board of Easy Talent Ltd and will be reviewed annually.

Signed

Louis Borhani

Name

Director

13 October 2026

Position

Date