

This Statement, which is published voluntarily, was approved by the Board of Smart Recruitment Solutions (Swindon) Ltd on 10.6.25 and relates to actions and activities during the Company's financial year from 1st January 2024 to December 2024.

Established in 2008, Smart Recruitment, a Limited Company, has 3 employees and is a provider of temporary and permanent recruitment solutions to a range of industry sectors in the South West of England. Smart Recruitment shares a Head Office (based in Swindon, Wiltshire), working practices and procedures with its sister company, Wise Employment (Swindon) Limited.

The statement outlines Smart Recruitment's commitment to preventing slavery and human trafficking in its business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.

Supply Chain and Policies

As a service-based organisation who does not manufacture physical products, the Company has a limited supply chain. Our procurement activities are low-risk and primarily relate to utilities, information technology, and professional services. We do not use subcontractors or engage recruitment intermediaries. Nonetheless, we expect all our suppliers and business partners to support and uphold our ethical values and commitments, including the prevention of modern slavery and human trafficking within their operations and supply chains.

Policies, Due Diligence and Training

Our Ethical and Codes of Conduct Policy outlines our responsibility and desire to act ethically and with integrity in all our business relationships. Our Preventing Modern Slavery and Hidden Labour Exploitation Policy reflects our commitment to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains. These policies implement processes to identify, monitor and mitigate risk areas.

Our internal audit process, which meets the requirements of the ISO 9001:2015 Quality Standard, ensures our policies, processes and procedures are implemented, monitored and reviewed.

Smart Recruitment holds a Gangmaster and Labour Abuse Authority Licence, which requires us to meet standards and legal requirements which include, health and safety, pay, transport and training.

All new employees must complete our Modern Slavery Training Module, which includes guidance on understanding, identifying and reporting potential issues, as well as training on our internal procedures for preventing modern slavery.

Identification and Mitigation of Risks

Our identified area of potential risk is the provision of temporary labour to our Client companies. In order to mitigate and manage our risk the following activities were undertaken in the year:

- Our Modern Slavery policy was reviewed to ensure it is still fit for purpose and shared across the business.

- Provided training to all staff to ensure that they are aware of issues around exploitation, how to spot signs of labour exploitation and how to deal with them
- Periodically, altered personnel working with specific clients
- Implemented procedures to maximise the opportunity for any worker who may be a victim to raise a concern, including:
 - Confidential one-to-one Registration Procedures
 - Registration Questionnaire
 - Issued a Worker Handbook with guidance
 - Regular welfare calls with Agency Workers
- Carried out weekly Payroll checks to identify duplicate addresses and/or bank account information
- Regularly review information provided during registrations and carry out spot checks on information provided, including next of kin information and mobile phone numbers
- Monitored our policy commitments via our Complaints Process and Internal Auditing procedures. No breaches of the Modern Slavery Act were reported or identified during the year.
- Reviewed our Policy Statement and monitoring outcomes during our Annual Management review attended by top management

Performance Indicators

- Continue to improve awareness by attending training workshops, webinars and on-line content.
- Increase our percentage score on our Stronger Together Labour Provider/Recruitment Business Good Practice Implementation Checklist
- Conduct Audits and produce analysis to ensure the effectiveness of our procedures to ensure that there is no Modern Slavery
- Cooperate with audits conducted by our client companies to demonstrate that our policies, procedures, and processes meet their standards and requirements.

Signed

A handwritten signature in black ink, appearing to read 'Keith Robinson', written over a light blue horizontal line.

Keith Robinson, Managing Director
June 2025