



SupplyNow Ltd Modern Slavery Statement 2025/2026

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

This statement is published in accordance with section 54 of the Act and relates to the financial year April 2025 to April 2026. It was approved by the board of directors on 4th April 2025

Introduction

This statement constitutes SupplyNow Limited Groups' modern slavery and human trafficking transparency statement as of April 2025. The statement sets down SupplyNow Limited's commitment to preventing slavery and human trafficking in our 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. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns, and management is expected to act upon them.

1 Our Business

SupplyNow Limited is a limited company operating in the recruitment sector. We provide introduction services and supply temporary workers in the education and construction sectors. SupplyNow Limited is an independent business. As part of our structure, our supply chain includes technology providers, compliance and auditing partners, payroll and finance software providers, training organisations and other third-party service providers who support the operation of our recruitment business. These suppliers are primarily based in the UK and provide services that support our internal operations rather than the delivery of temporary workers.

1.1 Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. Our staff identifies all of the temporary workers we supply. We do not supply work-seekers to hiring companies through any intermediaries.

The hiring companies that we work with are located in the UK. The workers we supply live in the UK, Ireland, Canada, Australia, South Africa, and the UAE.

In addition to hirers and work seekers, we engage a range of operational suppliers such as IT systems providers, marketing partners and professional service firms. All suppliers are subject to our due diligence processes.

1.2 Other relationships

As part of our business, we also work with the following organisations:

- The Department for Education
- Crown Commercial Services
- The Recruitment and Employment Confederation (www.rec.uk.com)



- The Employment Agency Standards Inspectorate (EAS)

2 Our Policies

SupplyNow Limited has a modern slavery policy that is available to view on our website.

In addition, SupplyNow Limited has the following policies, which incorporate ethical standards for our staff and our suppliers.

- To view a list of our data processing policies, please visit the Privacy page on our website: <https://www.supplynow.co.uk/policies>
- Corporate Social Responsibility Policy 2025 - *viewable on our [website](#)*
- Code of Conduct Policy 2025 - *viewable on our [website](#)*
- Anti-Bribery Policy 2025 - *viewable on our [website](#)*
- Whistleblowing Policy 2025 - *viewable on our [website](#)*
- SupplyNow Limited Child Protection & Safeguarding Policy 2025 - *viewable on our [website](#)*
- Equal Opportunities Policy 2025 - *viewable on our [website](#)*

2.1 Policy development and review

SupplyNow Limited's policies are established by our senior leadership team, which includes our CEO, Associate Director of Education & Safeguarding and Head of Marketing, based on advice from HR professionals, industry best practice and legal advice, and in consultation with our Head of HR, HR advisory consultants and the REC. We review our policies regularly, or as needed, to adapt to changes.

3 Our Processes for Managing Risk

To assess the risk of modern slavery, we use the following processes with our suppliers:

When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.

Although we have not identified any high risk activities, we recognise that certain aspects of our operations carry an inherent level of risk, including the recruitment of international candidates, the use of temporary labour and reliance on external service providers. We therefore continue to assess these areas regularly and remain alert to any changes that may increase vulnerability to exploitation.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

After a review of our business activities, the Management can confirm that there are no high-risk activities or at risk of modern slavery or human trafficking. Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** The Head of People is responsible for creating and reviewing policies. The process by which policies are reviewed annually, whereby they will look at industry best practices and implement any relevant amendments to the Company.
- **Risk assessments:** The Office Manager is responsible for risk assessments in respect of human rights and modern by a process of reviewing our business activities, confirming the right to work of



all candidates and that the rates of pay for all candidates are in accordance with the local legislation.

- **Due Diligence:** The Finance Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking. The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes a review of its financial history, what governing or regulatory body they are a member of, and customer references if a material supplier. Our aim is to build long-standing relationships with suppliers and make our expectations of business partners clear.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot checks of the businesses that supply us, in order to investigate any complaints.
- We require the businesses we work with to publish a modern slavery statement.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the risk potential.
- Our staff are encouraged to bring any concerns they have to the attention of management.

4 Our Performance

As part of monitoring the performance of SupplyNow Limited, we track the following general key performance indicators:

- The level of training amongst our staff
- The speed with which we investigate related complaints, and the effectiveness of our whistle-blowing procedures
- The level of compliance and transparency we have established in our supply chain
- Review of our Sage payroll and CRM to review our employee and candidate salaries to ensure they are above the national living wage
- This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by the senior leadership team:

- The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- The level of modern slavery training and awareness amongst our staff
- We carefully consider our indicators in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

We also measure our effectiveness by reviewing any reported concerns, near misses or safeguarding alerts related to exploitation and assessing whether appropriate corrective actions have been taken and recorded.

5 Our Training

All of our staff receive training and support that is appropriate to their role. In particular:



- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have. Training is refreshed annually. Training content is reviewed annually to ensure it reflects current risks within our business and supply chain. Staff in higher-risk roles, such as those working directly with candidates or conducting overseas recruitment, receive enhanced guidance on identifying indicators of exploitation.



Annex A – definitions contained in the Modern Slavery Act 2015

Section 1 - Slavery, servitude and forced or compulsory labour

- (1) A person commits an offence if—
 - (a) the person holds another person in slavery or servitude, and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
 - (b) The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.
- (2) In subsection (1) the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.
- (3) In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.
- (4) For example, regard may be had—
 - (a) to any of the person's personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons;
 - (b) to any work or services provided by the person, including work or services provided in circumstances which constitute exploitation within section 3(3) to (6).
- (5) The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude, or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

Section 2 – Human trafficking

- (1) A person commits an offence if the person arranges or facilitates the travel of another person (“V”) with a view to V being exploited.
- (2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).
- (3) A person may, in particular, arrange or facilitate V's travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.
- (4) A person arranges or facilitates V's travel with a view to V being exploited only if—
 - (a) the person intends to exploit V (in any part of the world) during or after the travel, or
 - (b) the person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel.
- (5) “Travel” means—
 - (a) arriving in, or entering, any country,
 - (b) departing from any country,
 - (c) travelling within any country.
- (6) A person who is a UK national commits an offence under this section regardless of—



- (a) where the arranging or facilitating takes place, or
- (b) where the travel takes place.

(7) A person who is not a UK national commits an offence under this section if—

- (a) any part of the arranging or facilitating takes place in the United Kingdom, or
- (b) The travel consists of arrival in or entry into, a departure from, or travel within, the United Kingdom.

Section 3 – Meaning of Exploitation

- (1) For the purposes of section 2, a person is exploited only if one or more of the following subsections apply in relation to the person.

Slavery, servitude and forced or compulsory labour

- (2) The person is the victim of behaviour—

- (a) which involves the commission of an offence under section 1, or
- (b) which would involve the commission of an offence under that section if it took place in England and Wales.

Sexual exploitation

- (3) Something is done to or in respect of the person—

- (a) which involves the commission of an offence under—
 - (i) section 1(1)(a) of the Protection of Children Act 1978 (indecent photographs of children), or
 - (ii) Part 1 of the Sexual Offences Act 2003 (sexual offences), as it has effect in England and Wales, or
- (b) which would involve the commission of such an offence if it were done in England and Wales.

Removal of organs, etc

- (4) The person is encouraged, required or expected to do anything—

- (a) which involves the commission, by him or her or another person, of an offence under section 32 or 33 of the Human Tissue Act 2004 (prohibition of commercial dealings in organs and restrictions on the use of live donors) as it has effect in England and Wales, or
- (b) which would involve the commission of such an offence, by him or her or another person, if it were done in England and Wales.

Securing services, etc by force, threats or deception

- (5) The person is subjected to force, threats or deception designed to induce him or her—

- (a) to provide services of any kind,
- (b) to provide another person with benefits of any kind, or
- (c) to enable another person to acquire the benefits of any kind.

Securing services, etc, from children and vulnerable persons

- (6) Another person uses or attempts to use the person for a purpose within paragraph (a), (b) or (c) of subsection (5), having chosen him or her for that purpose because:



- (a) he or she is a child, is mentally or physically ill or disabled, or has a family relationship with a particular person, and
- (b) An adult, or a person without the illness, disability, or family relationship, would be likely to refuse to be used for that purpose.

Useful Links & Resources

- [The Modern Slavery Act 2015](#)
- [The Modern Slavery Act 2015 \(Transparency in Supply Chains\) Regulations 2015](#)
- The Home Office's Modern Slavery website contains guidance for employers on how to spot the signs of modern slavery, and how to report it: www.modernslavery.co.uk
- The Home Office has also published [guidance](#) on complying with the Modern Slavery Act around transparency in supply chains.
- The REC is a supporting partner of Stronger Together, which provides guidance, training resources and a network for recruiters, workers and their clients to tackle hidden labour exploitation in supply chains: <http://stronger2gether.org/>



SupplyNow Limited

Registered Office: 45 Clarendon Road, Watford, WD17 1SZ
Company reg no 10399281 T: 020 3884 2589 W: www.supplynow.co.uk



Corporate
Member

Crown
Commercial
Service
Supplier