

## Modern Slavery Statement

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Smart Solutions' anti-slavery and human trafficking statement for the financial year 2025/26.

April 2025

### A message from our CEO

At Smart Solutions (Recruitment) Limited, we are unwavering in our commitment to ethical business practices and integrity in everything we do. Preventing modern slavery is a critical part of this commitment, and we continue to strengthen our approach to identifying and mitigating risks within our operations and supply chain.

We recognise that the fight against modern slavery requires continuous improvement. That's why we actively collaborate with organisations such as Slave Free Alliance (SFA), Hope for Justice (H4J), Stronger Together (S2G), and the Indirect Procurement Human Rights (IPHR) forum. These partnerships provide invaluable insights and resources, enabling us to refine our processes and enhance our safeguards.

We hold ourselves, and those we do business with, to the highest ethical standards. We expect our partners, suppliers, and representatives to have robust measures in place to prevent modern slavery within their own operations. To support this, we have further strengthened our internal due diligence and compliance frameworks.

Our latest Modern Slavery Statement reflects our deep commitment to eradicating modern slavery. We will continue to challenge ourselves, evolve our approach, and drive meaningful change across our business and industry.



*Matt Spaul*

Matt Spaul  
Chief Executive Officer  
Smart Solutions (Recruitment) Limited

## Organisational Structure

Smart Solutions (Recruitment) Limited (SSR) is a partnership driven outsourced labour solution, providing innovative workforce solutions for industries across the UK and Europe.

In order to deliver the highest level of expertise for our clients, SSR comprises of 2 Divisions, each with sector specialists working hard to ensure the highest level of service: -

- Environmental Support Services – delivers a fully outsourced labour solution to the Waste and Recycling sector.
- Managed Solutions – encompasses a labour-supply and on-site managed services provision which covers a broad range of specialisms.

## Legislation

The Modern Slavery Act 2015 was designed to tackle slavery in the UK.

Modern slavery is a criminal offence and can happen in various forms. The offence covers slavery, servitude, human trafficking and forced labour, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal gain.

## Our Employees

Smart recognises that its industry and the industries it supplies are often targeted by Gangmasters seeking to exploit individuals for financial gain.

Our workforce consists of permanent and flexible employees who work alongside our clients and their respective workforce.

Smart works particularly closely with our clients and other business partners to ensure consistency and collaboration on prevention activity.

## Review of Prior 12 months

### Governance

Delivery of modern slavery prevention practices at Smart is led by Jade Oliver-Morris, HR & Shared Services Director. Smart has also recently appointed Karla Conlan, a longstanding employee, into the post of Social Impact Manager.

Overall responsibility sits with the Smart Solutions CEO, who receives regular progress reports, as does the Senior Management Team and Group Board.

Over the last 12 months Smart have conducted an in-depth evaluation of its operating practices versus the legal requirements to conduct right to work checks. We have reviewed our ability to implement biometric clock-in systems in high risk and managed-service areas.

We have also continued to educate our employees on ways in which new immigration laws are impacting modern slavery and appropriate steps to help us remain vigilant. Although Anti-Slavery practices are a continuous focus, it is important for the business to recognise these occasions, to spread awareness and share good practice. We also continued to use social media to promote business action as well as contributing to the wider industry response to threat.

### Partnering and collaboration

Achieving Smart's commitment to ensure that modern slavery does not occur anywhere within its business operations or its supply chain, requires internal drive and energy but also external expertise, knowledge and collaboration. Smart chose to partner with Hope for Justice and Slave Free Alliance at the earliest opportunity in its focus on anti-slavery practices.

Slave-Free Alliance is a business scheme, run by global charity "Hope for Justice". Hope for Justice was founded in the UK in 2008 with the goals of preventing exploitation, rescuing victims, and restoring lives. Hope for Justice has since grown to become an international charity, working across four continents and running rescue programmes, aftercare facilities for vulnerable children and providing trauma care for victims of modern slavery.

Hope for Justice set up Slave-Free Alliance to work in collaboration with businesses to develop a proactive strategy that businesses and their supply chains can adopt to deal with the threat of modern slavery. The core

objective of Slave-Free Alliance is to support businesses to work towards a slave-free organisation and supply chain. Smart have worked with Slave Free Alliance and Hope for Justice on several occasions to present on our organisation's experiences and offer useful information and insight on how other organisations can do the same thing.

Smart are also members of/licensed by the following groups/organisations: -

#### ***Indirect Procurement Human Rights Forum Waste & Recycling Working Group***

The Indirect Procurement Human Rights (IPHR) Forum is a group of UK retailers, brands and manufacturers. We have a common vision to protect and respect human rights in our goods and services not for resale supply chains and facilitate collaborative responses to shared risks.

The IPHR Forum Waste & Recycling Working Group was formed to enable the IPHR Forum to increase and prioritise activity to address human rights issues in the waste & recycling sector.

The Working Group includes IPHR Steering Group members in addition to stakeholders with interests in human rights in the waste & recycling sector, including waste service providers, NGOs and Governmental bodies. Our vision is that through collaboration, we will drive positive change to improve the human rights of workers in waste & recycling supply chains.

#### ***Gangmasters and Labour Abuse Authority (GLAA)***

The GLAA works in partnership to protect vulnerable and exploited workers. They are a Non-Departmental Public Body (NDPB) governed by an independent board.

Their role is to protect vulnerable and exploited workers. Through intelligence, they investigate reports of worker exploitation and illegal activity such as human trafficking, forced labour and illegal labour provision. They investigate all aspects of labour exploitation in England and Wales and also collaborate with partner organisations such as the police, the National Crime Agency and other government law enforcement agencies to target, dismantle and disrupt serious and organised crime across the UK.

#### ***Stronger Together***

Stronger Together is a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking and other hidden third-party exploitation of workers. They provide guidance, training, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation.

Stronger Together focus on creating advice that is practical, pragmatic and easy for any business, of any size to understand and use. Stronger Together launched in the UK in 2013 and have since grown to have a global reach, running projects and programmes in countries across the world.

#### ***Association of Labour Providers***

Established in 2004 at the instigation of the UK government, ALP is a specialist trade association promoting responsible recruitment and good practice for organisations that supply the workforce to the food processing, agricultural and wider consumer goods supply chain.

The ALP influences government and regulatory policy and provides a range of very useful information and services to its members.

The ALP's mission is for "UK labour provision to be recognised as a model of global good practice".

#### ***The Social Recruitment Advocacy Group (SRAG)***

Smart joined SRAG in October 2023 in an effort to work with like-minded organisations to support those with barriers within the labour market. Since joining the group, Smart has championed the need to victims of modern slavery to be adequately represented through education, awareness and rehabilitation programmes. Smart's hard work was recognised with the Gold Chartermark award in September 2024 and efforts will continue towards Ambassador level in 2025.

## **Supply chains**

Targeting modern slavery within Smart's business operations is not enough. Smart is also committed to addressing the risk of modern slavery in its supply chain. Smart has conducted a re-audit of its second-tier labour suppliers over the last 12 months under the framework of its supplier management processes, Supplier Code of Conduct and Supplier Evaluation Questionnaire. This specific and detailed focus on anti-Modern Slavery practices is designed to assist us in supporting and working closely with our supply chain partners.

Ultimately, Smart expects its partners to work with it openly to identify and combat modern slavery. Smart will

only trade with those suppliers who fully comply with its Code of Conduct, or those who are taking verifiable steps towards compliance.

## **Policies**

Smart's commitment to raising the bar to combat the risks of modern slavery and human trafficking in every area of its business is also demonstrated in the following documents: -

- Hidden Labour Exploitation Policy
- Supplier Code of Conduct

Smart has a dedicated internal working group with a cross-section of skills and knowledge to drive the programme forward including Operations, HR, Shared Services and the Group departments of IT and Finance.

## **Training and awareness**

Training is delivered to all permanent Smart employees during induction and is refreshed annually via e-learning. Training includes how to spot the signs of Modern Slavery, escalation processes and emergency procedures. Employees who work in 'high risk' geographical areas, determined by field experts, receive advanced training. This can encompass insight into specific gangs, local intelligence and operations.

All temporary employees are trained during induction on how to spot the signs. An audit mechanism is also in place to ensure consistency and compliance.

Various marketing techniques are used to spread awareness amongst our workforce including posters, bathroom stall stickers, leaflets and contact cards. All marketing is translated into various languages and details contact information for Hope for Justice and Smart's 24/7 Confidential Helpline.

For Smart's supply chain partners, the 'Supplier Guide to Modern Slavery' is communicated during the evaluation process as part of requests for information. All 2<sup>nd</sup> tier agency suppliers are audited weekly on their right to work checks and training, and support is provided where necessary.

## **Remediation**

Smart works with charity partners across the UK to support in placing victims of modern slavery back in to work. Victims may have worked through Smart previously and been re-located and provided with safe harbour or may have worked through other employers. Building relationships with such partners as The Jericho Foundation, enable Smart to provide the most appropriate service and work assignment to a victim in line with their rehabilitation programme. Where possible and where we have multi-site contracts, Smart will endeavour to place a victim with the same client if they so wish. Smart offer training for specific skill areas as well as English Language courses.

## **Reporting**

Smart collates data on all suspect information including known associate information. Smart's weekly reporting from its personnel database to identify duplicates of bank account details, addresses and next of kin information has been upgraded and anything suspicious is investigated accordingly. Smart also holds a database of information collated through work with Police forces and Hope for Justice. Weekly reports identify changes or additions to personnel records that match this data. Full internal investigations are conducted on any data hit.

## **Next Steps and Targets**

Throughout the coming year, Smart will be focusing on its own internal change and staying consistent with process and procedures across the group. We will also work to document more of our processes that are inherent to key stakeholders but not collated formally.

We will continue to network with peers and external experts to share knowledge and experiences to understand what works well elsewhere and identify where further improvements can be made.

We will harness the energy and commitment of our staff as we proceed on our journey, including our "Modern Slavery Champions" who in addition to undergoing advanced training in Modern Slavery, will act as the regional focus for our initiatives as well as a key information sharing network internally and with key clients.

Employees who have had training strongly support our commitment to develop processes to prevent any

instances of modern slavery in our organisation. Once the role is bedded into the organisation, opportunities for expanding the initiative into the other divisions are to be considered.

We will continue to develop our awareness programme to ensure that all staff are aware of the signs of modern slavery and know what to do if they suspect that a colleague may be a victim.

### Summary of Actions and Goals

Completed Action 2024/2025	To Complete 2025/2026
Reviewed a means for policies to be automatically available to all employees without the need to request	Update the employee handbook to contain a greater focus on MDS
Reviewed the role of Modern Slavery Champions to ensure positions stay relevant and effective.	Review the Supplier Code of Conduct to: - <ul style="list-style-type: none"> <li>• ensure MDS related requirements are communicated in a more robust manner and expectations are clear</li> <li>• review statistics</li> </ul>
Achieved a Gold Chartermark for supporting those with barriers to the labour market, including victims of modern slavery.	Review the following policies: - <ul style="list-style-type: none"> <li>• Whistleblowing</li> <li>• Preventing Hidden Labour Exploitation</li> </ul>
Conducted evaluation and trial of face-to-face registration reporting.	Creation of a Modern Slavery Standard along with Employee and Manager Guide.
Began trialing biometric clock-in systems	Review our escalation process to ensure that: <ul style="list-style-type: none"> <li>• a pathway is in place to give direction to those involved in the process at the various stages</li> <li>• relevant stakeholders have the necessary skills, training and experience to deliver their response effectively</li> <li>• safeguarding processes are in place to address the needs of victims or others affected by the incident, as outlined in the incident support pack</li> <li>• senior management provides support during the delivery programme and addresses strategic issues</li> </ul>
Created a labour provider audit framework specific to our supply chain	Undertake a training needs analysis to establish if additional content relating to responsible purchasing practices, supplier management, and responsible supplier exit is necessary
	Formulation of a collective ESG policy and strategy
	Increase the number clients engaging in quarterly or bi-annual meetings to discuss labour exploitation risks and highlight best practice
	Implement worker welfare discussions as part of the tender process
	Review New Supplier Set Up Evaluation Questionnaire to include a free-text section to determine how the supplier addresses the risk of MDS both in its own business and supply chain

	<p>To document a process of open-source research across all prospective suppliers, including:</p> <ul style="list-style-type: none"> <li>• Companies House Research</li> <li>• Certificates and industry accreditations</li> <li>• The GLAA public register (labour providers only), including any recent inspections</li> <li>• Location of operations and geographical risk of modern slavery (see global slavery index)</li> <li>• General Google searches for links to adverse practices</li> </ul>
	<p>Document the entire compliance/audit process relating to non-labour providers to include, where possible:</p> <ul style="list-style-type: none"> <li>• Desktop research – including open source and available search tools</li> <li>• Supplier modern slavery evaluation questionnaire</li> <li>• Desktop review – provided policies and documents</li> <li>• Desktop assessment – virtual meetings with suppliers to discuss efforts</li> <li>• Supplier audits – with social bolt-on</li> <li>• In-depth supplier/site assessments, including site examination, managerial and process interviews, and worker discussions</li> </ul>
	<p>Implement a management system that records who amongst the temporary labour workforce has received the refer-a-friend payment</p>

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The statement was approved by the Smart Solutions (Recruitment) Limited CEO on 24<sup>th</sup> March 2025.

*Matt Spaul*

Matt Spaul  
**Chief Executive Officer**  
**Smart Solutions (Recruitment) Limited**