Modern Slavery and Human Trafficking Statement

Financial Year 2025/2026

Statement from the Board

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps taken by Major Recruitment Ltd during the financial year 2025/2026 to prevent modern slavery and human trafficking within our business and, where relevant, our business relationships.

Modern slavery is a serious criminal offence and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking. As a provider of temporary and permanent labour across multiple sectors, we recognise that recruitment businesses have an important role in identifying, preventing and responding to the risks of worker exploitation.

Major Recruitment has a zero tolerance approach to modern slavery and all forms of labour exploitation. Protecting and empowering workers is fundamental to the way we operate and is embedded throughout our recruitment, compliance and safeguarding processes. We remain committed to continually reviewing and strengthening our controls, policies to ensure they remain effective, proportionate and responsive to emerging risks.

Labour exploitation remains one of the most significant challenges for the UK temporary labour market. Economic uncertainty, organised criminal activity, labour shortages and the increased movement of vulnerable workers continue to create opportunities for exploitation across many sectors.

As a recruitment business supplying temporary and permanent workers into industries where labour exploitation risks can be higher, Major Recruitment recognises that preventing modern slavery requires more than legal compliance. It requires continual vigilance, robust recruitment practices, effective worker engagement and close collaboration with clients, industry bodies and enforcement agencies.

Our approach is based on identifying potential indicators of exploitation at the earliest opportunity, supporting vulnerable workers, and ensuring concerns are investigated promptly and escalated where appropriate. These principles underpin our operational procedures and form part of our wider commitment to ethical recruitment and responsible business practices.

1. Our Organisation

Major Recruitment Ltd is a UK recruitment business supplying temporary, contract and permanent workers across a broad range of sectors including industrial, logistics, manufacturing, food production, driving, Health & Social Care, commercial and professional services.

The temporary labour market presents unique challenges, particularly where vulnerable workers may be at greater risk of exploitation. We recognise those risks and have developed a compliance framework that places worker welfare, ethical recruitment and legal compliance front and centre within our operations.

Preventing labour exploitation is not treated as a standalone compliance exercise. The principles underpinning this statement are reflected throughout our wider compliance framework, including Right to Work verification, safeguarding, payroll assurance, branch auditing, worker engagement and client support.

2. Our Policies

Major Recruitment maintains a zero tolerance approach to all forms of modern slavery, human trafficking and hidden labour exploitation.

This commitment is supported through a number of internal policies and procedures, including:

- Hidden Labour Exploitation Policy
- Right to Work Policy
- Whistleblowing Policy
- Recruitment and Compliance Procedures
- Safeguarding Procedures
- Equality Diversity and Inclusion Policy
- Disciplinary Policy

Employees are expected to conduct themselves honestly, professionally and with integrity at all times. They are required to comply with all relevant legislation, Company policies and recognised standards applicable to their role, whilst supporting a culture of ethical recruitment and worker protection.

Policies are reviewed regularly to ensure they remain aligned with legislative requirements, operational experience and recognised industry best practice.

3. Our Business Relationships

Whilst Major Recruitment supply labour directly to our clients, we recognise that our responsibility does not end at the point a worker is placed. We continue to work closely with our clients throughout an assignment to promote ethical working practices, protect worker welfare and identify any indicators of labour exploitation at the earliest opportunity.Our approach continues to evolve through operational experience together with guidance published by organisations including Stronger Together, the Association of Labour Providers (ALP) and the Gangmasters and Labour Abuse Authority (GLAA).

4. Assessing and Managing Risk

Labour exploitation continuously evolves and no single control can eliminate risk entirely.

Our compliance arrangements are designed to identify indicators of exploitation at the earliest opportunity and are continually reviewed throughout the year.

Risk assessments are informed by:

- The sectors in which we operate
- Workforce demographics
- Operational observations from branches and client sites
- Findings from internal compliance audits
- Intelligence shared by industry and regulatory bodies
- Emerging trends identified through compliance activity

Where concerns are identified they are investigated promptly by our in house Compliance Team, our Senior Management Teams and, where appropriate escalated to the appropriate enforcement authority where necessary.

5. Due Diligence

Due diligence forms part of our everyday operational activity rather than a standalone process.

Every worker undergoes identity verification and Right to Work checks before being placed into employment. Recruitment is undertaken by trained employees who ensure applicants understand the nature of the work, rates of pay and terms of engagement before accepting an assignment.

Major Recruitment does not charge recruitment or work-finding fees.

Technology supports our compliance framework by helping identify potential indicators of labour exploitation.

Our systems prevent workers from being placed where mandatory Right to Work documentation has not been completed. Automated reporting is used to identify duplicate bank accounts and duplicate residential addresses, recognising that these may indicate labour exploitation or hidden worker arrangements.

These reports are reviewed weekly by the Payroll Team before being independently verified by the Compliance Team as part of its monthly audit programme. Any anomalies are investigated and escalated where appropriate.

This combination of automated controls and independent oversight helps ensure compliance is consistently maintained across the business.

6. Recruitment and Worker Protection

Protecting workers begins at the point of recruitment and continues throughout their engagement with the business.

Applicants are recruited directly by trained employees who are expected to exercise appropriate professional judgement, challenge unusual circumstances and escalate any concerns relating to worker welfare or potential exploitation.

Workers are provided with information regarding hidden labour exploitation together with details of confidential reporting mechanisms and external support organisations.

Any safeguarding concerns or indicators of labour exploitation are investigated promptly, with referrals made to the appropriate authority where necessary.

7. Training and Awareness

Training remains one of the most effective ways of identifying and preventing labour exploitation.

All employees complete Stronger Together awareness training within the first three months of employment as part of their mandatory induction.

Major Recruitment also maintain a minimum of four accredited Stronger Together trained representatives who have completed recognised training within the previous two years. These individuals provide additional support and guidance across the business and help ensure knowledge remains current.

Training is reviewed regularly to reflect changes in legislation, emerging risks and recognised industry best practice.

8. Monitoring Effectiveness

The effectiveness of our modern slavery arrangements is monitored through operational reporting, compliance auditing and independent oversight.

During the reporting period this included:

- Completion of mandatory Stronger Together awareness training by all operational employees within their first three months of employment.
- Monthly compliance audits across every operational branch and managed service location as a minimum.
- Weekly payroll reporting to identify duplicate bank account details, with independent monthly verification undertaken by the Compliance Team.
- Verification of every worker's documentation & Right to Work before commencing engagement, together with independent re-verification through the Compliance Team's audit programme
- Investigation of safeguarding concerns and indicators of labour exploitation identified through operational activity, worker engagement, audits or client feedback, with escalation to the appropriate authority where necessary.
- Ongoing review of compliance findings to identify trends, strengthen internal controls and inform future training and procedural improvements.
- Independent verification of our processes by way of an annual Complyer audit.

These measures provide assurance that our compliance framework continues to operate effectively whilst identifying opportunities for further improvement.

9. Working with Industry

Major Recruitment recognises that tackling modern slavery requires collaboration across the recruitment industry.

We actively engage with organisations including:

- Gangmasters and Labour Abuse Authority (GLAA) – Now part of the Fair Work Agency
- Association of Labour Providers (ALP)
- Stronger Together
- SEDEX

Participation in these organisations enables us to monitor legislative developments, emerging risks and recognised best practice, helping ensure our procedures continue to evolve alongside industry expectations.

10. Continuous Improvement

Preventing labour exploitation requires constant review.

Our policies, procedures and compliance controls are reviewed throughout the year in response to operational experience, internal audit findings, compliance investigations and guidance published by organisations including Stronger Together, the ALP and the GLAA.

Feedback from employees, workers, clients and compliance activities also informs future improvements. This approach allows us to respond to emerging risks while ensuring our controls remain practical, proportionate and effective.

Approval

This statement has been prepared for and approved by the Board of Directors of Major Recruitment Ltd and constitutes the Company's Modern Slavery and Human Trafficking Statement for the financial year 2025/2026.

Katie Howarth

Katie Howarth
Group Managing Director

Date: July 2026