



Coople (UK) Ltd Anti-Slavery and Human Trafficking Statement

April 2021



Coople (UK) Ltd Anti-Slavery and Human Trafficking Statement

This statement is published in accordance with section 54 of the Modern Slavery Act 2015 (the Act). It sets out the steps taken by Coople (UK) Limited (“we” or “our”) to prevent modern slavery and human trafficking in its business and supply chains during the financial year April 2021 to April 2022. It was approved by the board of directors on 1st April 2021.

Sacha Bielawski
Chief Financial Officer

Our Business

We have a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains. We are committed to eliminate the exploitation of people under the Modern Slavery Act 2015 (the Act).

We supply recruitment services of temporary workers in the hospitality, office, retail and logistics sectors. Coople (UK) Ltd is part of the wider Coople Global group. For details of our group structure, see www.coople.com

We are also members of the following trade body:

- Recruitment and Employment Confederation (“REC”) (www.rec.uk.com)

We work closely with this trade body to improve industry-wide standards and advocate laws and policies where appropriate.

Our Policies

Our legal responsibilities under the varied acts and regulations form the basis for our policies and procedures and serve to reinforce what we consider to be ethical standards that should be applied at all times in every aspect of our business.

These policies include:

- Modern Slavery Policy
- Code of Business Conduct and Ethics
- Employee Handbook, incl. Whistleblowing Policy

Our policies are established by our senior leadership and Human Resources team, based on industry best practice and in consultation with legal advisors. All policies are reviewed on an annual basis or as necessary pending legal requirements.

Supplier Code of Conduct

We expect our suppliers to agree and adhere to our ethical standards for doing business. These standards require suppliers to:

- Refrain from holding a person in slavery or servitude or requiring a person to perform any form of forced or compulsory labour
- Not arrange or facilitate the trafficking of any person
- Not purchase materials or services from companies who use involuntary labour or participate in human trafficking
- Treat and reward employees equally on the basis of the characteristics of their work and the intensity of their efforts
- Provide for safe, hygienic, and healthy working environments for their employees
- Pay the national minimum wage
- Act in accordance with applicable laws and regulations

Due Diligence Processes

As part of our initiative to identify, monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, we have undertaken the following due diligence procedures:

- 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.
- We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

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.

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

- We require the businesses we work with to abide by our code of supplier conduct
- 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 potential for risk.

- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.
- Our staff are encouraged to bring any concerns they have to the attention of management.

Our Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide training to our staff where relevant.

We have also published a Modern Slavery Policy with detailed guidance for staff, which is available at all times via our internal intranet system.

Version	Effective Date	Sponsor	Next review	Notes
V1 Mar-2019	01/04/2019	S Bielawski	March 2020	
V2 Apr-2020	01/04/2020	S Bielawski	March 2021	
V3 Apr-2021	01/04/2021	S Bielawski	March 2022	