

Modern Slavery and Human Trafficking Policy

Introduction

This statement sets out First Response Group Ltd.'s (FRG) arrangements to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Under the Modern Slavery Act 2015, First Response Group has a legal obligation to publish this statement, and in compliance it can be found on our website.

As part of the manpower services sector, FRG recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

FRG is committed to preventing slavery and human trafficking in its manpower service activities, and to ensuring that its supply chains, albeit predominately United Kingdom based and small, are free from slavery and human trafficking.

Policy Statement

“FRG is committed to upholding the highest standards of ethical conduct and human rights across all aspects of our operations and supply chain. We recognise modern slavery and human trafficking as objectionable violations of human dignity and fundamental freedoms.

As such, we are dedicated to combating these crimes through proactive measures aimed at prevention, detection, and mitigation. We pledge to uphold rigorous policies and procedures to ensure that slavery and human trafficking have no place within our organization or within the organizations we engage with. Our commitment extends to nurturing a culture of awareness and accountability among our employees, suppliers, and partners. We will continually assess and improve our practices to safeguard against the risks of exploitation and to promote ethical and sustainable business practices.

At FRG, we resolve to contribute to the global efforts in eradicating modern slavery and human trafficking.

Purpose

The purpose of this policy is to demonstrate our commitment to combatting modern slavery and human trafficking in all its forms. It outlines FRG's stance against slavery and human trafficking, whilst establishing procedures for identifying and addressing such practices within its operations and supply chains and ensures compliance with all relevant legislation and regulations.

In addition, it aims to raise awareness among employees, suppliers, and stakeholders about the importance of eradicating slavery and promoting ethical business practices.

Definition of Modern Slavery and Human Trafficking

Modern slavery is defined as the various forms of exploitation where individuals are coerced, deceived, or forced to perform labour or services against their will.

This can include forced labour, debt bondage, human trafficking, and forced marriage, among others. Human trafficking is defined as the recruitment, transportation, transfer, harbouring, or receipt of persons through the use of force, fraud, or coercion for the purpose of exploitation. This exploitation can take many forms, including forced labour, sexual exploitation, forced marriage, or the removal of organs.

Legal Framework

The Modern Slavery Act is a piece of legislation, which sets out a range of measures on how modern slavery and human trafficking should be dealt with in the UK. Whilst not all of the Act is directly relevant for our business, section 54 entitled 'Transparency in supply chains' impacts the corporate sector.

Organisational Structure and Supply Chains

This statement covers the activities of First Response Group Ltd & subsidiaries

We are an independent service provider to the infrastructure, corporate construction stadium and events and facilities management sectors. The organisation was founded in June 2007 and develops partnerships with its clients, understanding their service needs and strategy that lead to provision of bespoke solutions to meet expectations.

The organisation's workforce is employed on permanent and temporary Pay as You Earn (PAYE) contractual basis. All right to work, residency, competence cards/certificates and employment history verification checks are conducted in accordance with the Immigration, Asylum and Nationality Act 2006, British standards, and Quality Management Systems procedure requirements.

The organisation currently operates in the following countries:

- United Kingdom

Risk Assessment

FRG recognises that the risk of modern slavery and human trafficking can exist within both its direct operations and supply chains, regardless of location or industry sector. The organisation therefore adopts a risk-based approach to identifying, assessing, monitoring, and mitigating potential risks.

Areas considered to present an elevated risk may include:

- Labour-intensive services and subcontracted activities.
- Temporary, agency, migrant, or low-skilled workforces.

- Suppliers operating within sectors known to have higher risks of labour exploitation.
- New suppliers where compliance arrangements have not yet been verified.
- Suppliers with limited transparency regarding employment practices or labour sourcing.

As part of its risk assessment process, FRG will:

- Assess all new suppliers through a pre-qualification and due diligence process.
- Evaluate suppliers against labour standards, right-to-work requirements, ethical employment practices, and compliance with applicable legislation.
- Review supplier performance through audits, site visits, questionnaires, and management reviews where appropriate.
- Investigate any reports, concerns, or indicators of potential labour exploitation.
- Maintain a risk register documenting identified risks, actions taken, responsible persons, and review dates.
- Escalate significant concerns to the Group Compliance Director and, where necessary, to relevant regulatory or law enforcement authorities.

Risk assessments will be reviewed at least annually and whenever there are significant changes to business activities, supply chains, legislation, or identified modern slavery risks.

Where risks are identified, FRG will implement appropriate corrective actions, which may include enhanced monitoring, supplier improvement plans, suspension of business activities, or termination of supplier relationships where serious breaches are identified.

Responsibility

The responsibility for the FRG's anti-slavery initiatives is as follows:

- Policies: Chief Operating Officer/Board of Directors
- Investigations/Due Diligence: The Group Compliance Director is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- Training: The Group Compliance Director/QSHE Manager are responsible for ensuring that the awareness of slavery and human trafficking risks are communicated throughout the organisation and through the supply chain.

Reporting and Escalation

FRG encourages all employees, workers, suppliers, contractors, and other stakeholders to report any concerns relating to modern slavery, human trafficking, forced labour, or other forms of exploitation without delay.

All concerns will be treated seriously and investigated in accordance with the organisation's reporting and investigation procedures. Individuals raising concerns in good faith will not suffer retaliation, victimisation, or detrimental treatment as a result of making a report.

Reports may be raised through line management, Human Resources, the whistleblowing process, or other designated reporting channels. Where appropriate, concerns may be escalated to relevant enforcement agencies or regulatory authorities.

Further guidance on reporting routes, escalation requirements, and investigation processes is contained within the organisation's Whistleblowing Policy and associated investigation procedures.

Victim Support and Protection

FRG is committed to treating all individuals with dignity, fairness, and respect and recognises that victims of modern slavery and human trafficking may be vulnerable and require appropriate support.

Where concerns are identified, FRG will take reasonable steps to safeguard individuals who may be affected and will work with relevant authorities, agencies, clients, and support organisations where appropriate.

The organisation will:

- Treat all reports and disclosures sensitively and confidentially.
- Prioritise the welfare and safety of individuals who may be at risk of exploitation.
- Ensure that concerns are investigated promptly and appropriately.
- Support victims in accessing information, guidance, and specialist support services where required.
- Cooperate with law enforcement agencies and other relevant bodies in the investigation of potential offences.
- Ensure that no employee or worker who raises a concern in good faith will suffer retaliation, victimisation, or detrimental treatment.

FRG recognises that modern slavery is often hidden and complex. Any action taken will place the welfare, safety, and legal rights of affected individuals at the centre of the organisation's response.

Relevant Policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Employee Concerns (Whistleblowing) Policy: The organisation encourages all stakeholders to report any concerns related to the direct activities. This can include any circumstances that may give rise to an enhanced risk of slavery or human trafficking. FRG's policy is designed to make it easy for workers to make disclosures, without fear of retribution. Employees, customers, or others who have concerns can report any activities associated to slavery and human trafficking by contacting their immediate line manager, Human Resources or confidentially to the COO/HRD via the website.

Employee Code of Conduct: FRG's code of conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation. FRG strives to maintain the highest standards of employee conduct and ethical behaviour.

Supplier/Procurement Code of Conduct: FRG is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. As part of the supply chain selection process all potential and existing suppliers are required to complete a supplier questionnaire to assess their suitability as a supplier. Within the supplier questionnaire all suppliers are required to provide evidence of their compliance towards Labour Standards and the Asylum & Immigration Act 2006.

This enables the procurement team to identify any potential risks to the quality of the service provision or goods being provided by the supplier and prevent any slavery or human trafficking. All suppliers are audited against the supplier code of conduct.

Recruitment Policy: FRG only employs people on a permanent or temporary PAYE contractual basis. Prior to commencement of employment all employees are subject to right to work, residency, competence cards/certificates and employment checks in accordance with the Immigration Asylum and Nationality Act 2006 and British standards Quality Management System procedures.

The Recruitment Policy is compliant to all EU and UK legislation, including the minimum wage and therefore is not at risk of slavery and human trafficking.

Corporate Social Responsibility Policy: FRG's Corporate Social Responsibility Policy covers the responsibilities of the Board of Directors and its commitment towards the external Environment, Health & Safety, Workplace, and assurance to the supply chain code of conduct. The Policy is communicated to the whole workforce and forms part of the induction programme.

Anti-Bribery/Fraud Policy: FRG's Anti Bribery Policy aims to prevent any form bribery being committed within the organisation and by any stakeholder(s) associated with its business. We foster a culture of integrity where bribery is unacceptable. This policy is communicated to all employees and forms part of the induction programme.

Due Diligence

FRG undertakes appropriate due diligence when selecting, engaging, and reviewing suppliers, contractors, labour providers, and other business partners to minimise the risk of modern slavery and human trafficking within its operations and supply chains.

As part of its due diligence process, FRG will:

- Assess prospective suppliers through a pre-qualification and approval process prior to engagement
- Evaluate suppliers against relevant labour standards, right-to-work requirements, ethical employment practices, and applicable legal obligations

- Require suppliers to demonstrate compliance with the Modern Slavery Act 2015 and, where applicable, provide evidence of their own modern slavery controls and policies.
- Apply a risk-based approach to supplier assessment, giving additional scrutiny to suppliers operating in higher-risk sectors, activities, or labour markets.
- Conduct periodic supplier reviews, audits, questionnaires, and site visits where appropriate to assess ongoing compliance.
- Investigate any reported concerns, allegations, or indicators of modern slavery, human trafficking, forced labour, or exploitation
- Require suppliers to implement corrective actions where deficiencies are identified and monitor progress to completion.
- Maintain records of due diligence activities, risk assessments, audit findings, and corrective action plans.

Where a supplier is unwilling or unable to address identified risks or breaches of ethical labour standards, FRG reserves the right to suspend, restrict, or terminate the business relationship in accordance with contractual and legal obligations.

The effectiveness of the organisation's due diligence arrangements will be reviewed periodically as part of the wider modern slavery risk management programme to ensure continual improvement and ongoing compliance.

Performance Monitoring and Key Indicators (KPIs)

FRG is committed to continually monitoring and improving the effectiveness of its actions to prevent modern slavery and human trafficking. To measure performance and demonstrate compliance, the organisation will monitor and review a range of key performance indicators on an annual basis.

These indicators may include:

- Percentage of employees who have completed modern slavery awareness training.
- Percentage of new starters receiving modern slavery training during induction.
- Number and percentage of suppliers assessed through the supplier due diligence process.
- Number of supplier audits completed during the reporting period.
- Number of modern slavery concerns, incidents, or allegations reported
- Number of investigations conducted in relation to suspected modern slavery or human trafficking.
- Number of corrective action plans issued to suppliers and the percentage successfully completed.
- Number of suppliers suspended or removed from the supply chain due to non-compliance with ethical labour standards.
- Completion of annual supply chain risk reviews and updates to the Modern Slavery Risk Register.

The relevant heads of department shall review KPI data annually and report findings to the Board of Directors. Where monitoring identifies weaknesses, trends, or areas of increased risk, appropriate corrective actions will be implemented and tracked to completion.

FRG will use the results of this monitoring process to strengthen policies, improve due diligence processes, enhance training programmes, and support continuous improvement in the prevention of modern slavery and human trafficking throughout its operations and supply chain.

Training and Awareness

FRG is committed to ensuring that all employees understand the risks of modern slavery and human trafficking and are equipped to identify, prevent, and report potential concerns within our operations and supply chains.

Modern slavery awareness training will be provided to all employees as part of the induction process and refreshed periodically to ensure knowledge remains current and effective. Additional role-specific training will be delivered to employees whose responsibilities include recruitment, procurement, supply chain management, contract management, site supervision, compliance, and leadership.

Training will include:

- An overview of the Modern Slavery Act 2015 and related legislation.
- An understanding of modern slavery, forced labour, human trafficking, debt bondage, and labour exploitation.
- Indicators and warning signs that may suggest an individual is at risk of exploitation.
- Risks associated with labour-intensive industries, subcontracting arrangements, and supply chains.
- Responsibilities of employees, managers, suppliers, and contractors.
- Procedures for reporting concerns and escalating suspected instances of modern slavery.
- The organisation's whistleblowing arrangements and protections for those raising concerns in good faith.
- Available external resources and support services, including the Modern Slavery Helpline and relevant enforcement agencies.
- Actions that may be taken where suppliers, contractors, or business partners fail to meet FRG's ethical standards.

The effectiveness of training will be monitored through attendance records, completion rates, periodic assessments, management reviews, and feedback from participants. Where gaps in awareness or understanding are identified, additional training and guidance will be provided.

FRG will also promote awareness through:

- Internal communications, newsletters, and compliance bulletins.
- Posters and awareness materials displayed in relevant workplaces.

- Toolbox talks and management briefings.
- Supplier engagement and communication regarding modern slavery expectations.
- Annual policy reviews and awareness campaigns.

The organisation is committed to fostering a culture in which all employees feel confident to raise concerns without fear of retaliation and understand their role in preventing modern slavery and human trafficking.

Board Approval

This policy has been approved by the Board of Directors and will be reviewed annually to ensure its continued suitability, effectiveness, and compliance with applicable legislation.

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Policy Approved By	Derek Neilson
Signed	
Position	Group Operations Manager