

# MODERN SLAVERY POLICY

**HIDDEN IN  
PLAIN SIGHT  
SITE**

MODERN SLAVERY IN THE CONSTRUCTION INDUSTRY

# INTRODUCTION

GS3 Recruitment Ltd remains committed to meeting the requirements of the Modern Slavery Act 2015 and preventing modern slavery in all our company activities, and ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking. We recognise that slavery and human trafficking remains a hidden affliction on our society. We all have a responsibility to be vigilant to the risks, however small, in our business and in the wider supply chain. We have a zero-tolerance to this issue and expect our people, suppliers and sub-contractors to comply with our values. Our Anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

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# DEFINITIONS

**Human Trafficking:** the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

**Forced Labour:** all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

**Harmful Child Labour:** consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

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# REQUIREMENTS FOR SUPPLIERS

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty.
- Will ensure that the overall terms of employment are voluntary.
- Will comply with the minimum age requirements prescribed by applicable laws.
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Will abide by applicable law concerning the maximum hours of daily labour.
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK.
- Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to GS3 Recruitment, also adhere to these requirements.

## CONSEQUENCES

- GS3 Recruitment takes any breach of this Policy extremely seriously.
- Suppliers who are found to have or be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with GS3 Recruitment terminated immediately, without compensation.
- If a Supplier to GS3 Recruitment is found in violation of this policy, GS3 Recruitment will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier (as above). It shall also take such other (remedial) steps as the Anti- Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

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## WHAT WE DO

To ensure compliance across all of our sites and offices, including employees, self- employed operatives and supply chain member including agencies, GS3 Recruitment will conduct random interviews on site. These interviews will be co-ordinated and managed by the HR Manager.

We will ensure:

- interviews are carried out in a private room;
- interview process is explained to the interviewee;
- the same question set will be followed at all interviews;
- status of RTW will be checked during the interviews;
- confirmation that minimum wage or above is being paid ;
- conversation around living situation;
- conversation around treatment on site.

Signed:



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Stephen Spendley, Managing Director



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