

## Lanes Employment Solutions Limited

### Modern Slavery and Human Trafficking Statement

#### Introduction

This statement sets out Lanes Employment Solutions Limited actions 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. This statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.

As a Human Resourcing business, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

#### Organisational structure and supply chains

This statement covers the activities of Lanes Employment Solutions Limited who currently operate in within the United Kingdom, with low-risk activities.

Lanes Employment Solutions Limited, specialise in supporting businesses with every aspect of HR. For businesses that do not have an internal HR department, dealing with employee matters can be time-consuming, challenging and confusing. Our team will alleviate this pressure, becoming a trusted extension of your team and freeing up your time to focus on other aspects of your business.

#### Responsibility

Responsibility for our anti-slavery initiatives which are reviewed annually and owned by our Managing Director include:

- Policies
- Risk Assessments
- Investigations/due diligence
- Training

#### Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing Policy:** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

**Employee Code of Conduct** makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

**Supplier & Procurement Code of Conduct:** We are committed to ensuring that our 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. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship

**Recruitment Policy:** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from that agency.

### **Due diligence**

We undertake due diligence when considering taking on new suppliers, and regularly review its existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through [the organisation's own staff/third party auditor], which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through [third party auditor] and requiring them to implement action plans.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### **Performance Indicators**

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all staff to have completed training on modern slavery annually
- reviewing its existing supply chains expected to be completed annually whereby we evaluate all existing suppliers.

### **Training**

We require all staff within our organisation to complete training on modern slavery as a module within our wider human rights/ethics/ethical trade training programme.

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;



- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

### Awareness-raising Programme

As well as training staff, we have raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

This statement was approved on April 2021 by our Managing Director, who will review and update it annually.

