



## FOMAC Modern Slavery & Human Trafficking Policy

**Financial Year 2022-2023**

### **Introduction**

Modern Slavery is a term used to encapsulate two offences in the Modern Slavery Act 2015;

- Slavery, servitude and forced or compulsive labour
- Human trafficking

We have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety, human rights laws and international standards are adhered to, including freedom of movement and communications. We are committed to improving our practices to combat slavery and human trafficking.

### **Our Business**

Fomac Construction Ltd is a recruitment agency providing temporary and permanent labour, trades and technical workers to clients in the construction industry.

Fomac Construction Ltd is a Small Medium Enterprise (SME) and is not part of a group of companies.

### **Our Policies**

Fomac has the following policies in place relating to Modern Slavery and Human Trafficking:

- Health and Safety Policy
- Sustainable Procurement Policy
- Ethical Business Statement
- Quality Policy
- Corporate Social Responsibility

### **Our Supply Chain**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Ethical Business Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to ensure fair conditions and treatment for all.

Fomac procures products and services to maintain the integrity of the business, key areas being:

- IT hardware, software and telecoms
- Vehicles
- Medical Insurance
- Stationery and Promotional Products
- Office Furniture
- Personnel Protection Equipment and Workwear
- Training Services

## Identification of potential risk of slavery and human trafficking areas in the business

Fomac has identified the following business areas as having the most significant potential risk:

- The provision of Agency labour
- The Supply Chain

### The provision of agency labour

**The potential risk** – enslaved or human trafficked individuals are placed in work as agency labour with clients

**Risk control** – rigorous checks are made on every individual including eligibility to work, references, qualifications, proof of NI, and bank details to ensure each person is acting in their own right

### The Supply Chain

**The potential risk** – the use of suppliers that contravene the Modern Slavery Act 2015

**Risk control** – new and current suppliers at evaluation and re-evaluation are verified as being in compliance with the Modern Slavery Act 2015

### Due diligence process for slavery and human trafficking

As part of our initiative to identify and mitigate risk;

- We conduct internal audits on our Candidate Registration, Selection and Placement procedures to ensure that only eligible workers are placed with our clients
- We evaluate new key suppliers and verify via their Modern Slavery & Anti Trafficking Policy their compliance to the Modern Slavery Act 2015.
- We evaluate all current key suppliers annually and verify via their Modern Slavery & Anti Trafficking Policy their compliance to the Modern Slavery Act 2015.
- Our suppliers are locally based where we can influence our commitment.
- National or international supply chains with our point of contact often with a UK company are expected to have suitable policies in place. It is not practical to have a direct relationship and influence with all levels of our supply chain.

### Monitoring Effectiveness

We measure the effectiveness of our risk control measures and due diligence to ensure that slavery and human trafficking is not taking place in our business or supply chains. The Key Performance Indicators (KPIs) are;

100% pass rate in the internal audits of the Candidate Registration, Selection and Placement procedures

100% confirmation of key suppliers being in compliance with the Modern Slavery Act 2015

### Training

Information is provided to our employees via our induction process and the Recruitment & Employment Confederation website.

### Signed:

**Name:** James McMahon

**Position:** Director

**Date:** 31st May 2022, next review May 2023