

# Modern Slavery Policy

## **Introduction from the Director – Mr Tope Osazee of Apex Resources Limited**

We are proud of the steps we have taken to combat slavery and human trafficking.

## **Organisation's structure**

We are a supplier of labour to the construction sector. We operate in England, UK.

We have over 60 employees.

We have an annual turnover of £49,028,286 – 2018/19 accounts.

## **Our business**

Our business has 6 offices in the UK with our head office based in Watford.

## **Our supply chains**

Our supply chains include construction sector: contractors, operatives and suppliers of operatives.

## **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

ONLINE LINK TO ANTI-SLAVERY POLICY HERE:

<http://www.apexltd.co.uk/pdfs/Apex-Resources-Ltd-Modern-Slavery-Statement-2019.pdf>

## **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we update our people on being proactive in spotting anti-slavery scenarios, as part of our agreement with suppliers, we enter into a separate anti-slavery and human trafficking agreement and ask our suppliers to complete our modern slavery and human trafficking due diligence questionnaire.

We thus have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a rigorous supply chain compliance programme. This consists of: anti-slavery and human trafficking agreement with our suppliers, having our suppliers complete our modern slavery and human trafficking due diligence questionnaire and staff training.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Audit and compliance.
- Human resources.
- Sales.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

## **Our effectiveness in combating slavery and human trafficking**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

**Vetting procedures.** We continue to vet all our new and current suppliers and sub-contractors for ethical labour practices by sending them questionnaires and visiting sites regularly as mentioned above.

**Screening.** We did not identify any number and type of anti-slavery and human trafficking problem issues during our on-going screening of suppliers and sub-contractors.

**Subcontractor inspections.** We carry out site visits to contractors on a weekly basis and during those quasi-inspections of sub-contractors we did not find any breaches or hints of breaches of anti-slavery law.

**Whistleblowing.** There were no reported breaches in the past year.

**Training.** We have an ongoing staff training and awareness policy which we facilitate.

**Remedial action.** We have not had cause to effect any remedial action and thus this was not needed.

### **Further steps**

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Be more alert to any hints, direct and indirect notifications to us by operatives and third parties of any form of Slavery, Servitude and Forced or Compulsory Labour;
- If we see, suspect or are told of any signs of this happening for example, when we visit sites, we will investigate the matter further so that we can alert the police if necessary. If risk is identified, we will assess the level of risk and take steps to prevent, monitor and mitigate the risk.

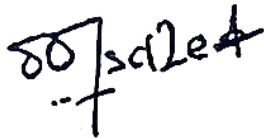
This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 28 February 2019.

## Contact Us

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Signed

A handwritten signature in black ink, appearing to read "Tope Osazee", with a stylized flourish at the end.

Date: 12/08/2020

Tope Osazee, Managing Director

# Modern Slavery Statement

## 1. Modern slavery statement for financial year 2019/20

We are proud of the steps we have taken to combat slavery and human trafficking.

- 1.1 Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to continue adopting further steps to combat slavery and human trafficking.
- 1.2 This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Apex Resources Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.
- 1.3 Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Apex Resources Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain, however small.

## 2. Our business

- 2.1 Apex Resources Ltd is A privately owned Recruitment Business with an annual turnover of just under £50 million (February 2020) operating from Six regional offices at London, Watford, Coventry, Manchester, Edinburgh and Glasgow, with over 60 direct employees and over 2500 workers on assignments weekly offering services as an Employment Business within the Construction, Driving, Industrial, rail and public sector markets throughout Europe.

## 3. Our high risk areas

- 3.1 It is well known that the construction labour market is a target for the exploitation of workers with sector cost of supply being margin driven and unregulated companies entering this market daily. To monitor and mitigate the risk of exploitation in our supply chain we have many years adopted a due diligence process to all suppliers which comprises the following:
- 3.2 All our current Suppliers and clients have a UK based operation.

- 3.3 We aim to build long standing relationships with suppliers and require them to adhere to our high expectations of behaviour.
- 3.4 Nationwide supply chains, must have a UK based point of contact and expect their entities to have suitable human-trafficking and anti-slavery policies and processes and/or agree to adopt our ethical values in this area. Although it is not possible to have control of the full supply chain we require due diligence/ practice from every business that we have a direct relationship with.
- 3.5 We encourage and protect whistle blowers within what the law and ethics permit.

#### **4. Our suppliers**

- 4.1 Apex Resources Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence processes on all our suppliers before promoting them to become a preferred supplier. This due diligence includes an online search to ensure that the particular organisation has never been convicted of offenses relating to modern slavery and whenever possible, on site audits. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contravenes this policy.
- 4.2 In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:
- They have taken steps to eradicate modern slavery within their business
  - They hold their own suppliers to account over modern slavery
  - They pay their employees at least the national minimum wage / national living wage (as appropriate)
  - We may terminate the contract at any time should any instances of the practice of modern slavery comes to light

#### **5. Staff Training**

- 5.1 We will provide training to relevant staff members to ensure that our procurement/buying teams understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## **6. Our performance indicators**

- 6.1 We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:
- No reports are received from employees, the public, or the authorities to indicate that modern slavery practices have been identified.

## **7. Approval for this statement**

- 7.1 This statement was approved by the Directors Of Apex Resources Ltd on 7 May 2020  
Tope Osazee (Director)
- 7.2 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2018/19.