

<b>Company Name:</b>	Rotherwood Recruitment (2020) Ltd (“the Company”) T/A Rotherwood Recruitment / Rotherwood Education
<b>Model Policy Name:</b>	<b>MODERN SLAVERY POLICY</b>
<b>Date:</b>	June 2025

1. Rotherwood Recruitment (2020) Ltd is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Rotherwood Recruitment (2020) Ltd is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Rotherwood Recruitment (2020) Ltd provides appropriate training and awareness information for all of its staff.

In particular:

- Our recruiters and staff involved in our procurement and supply chains undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
  - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to identify an appropriate contact(s), by name or by role.
  5. Reports surrounding these issues are taken extremely seriously by [our board of directors / the partners / senior leadership team / briefly describe those responsible], who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
    - Working with the appropriate organisations to improve standards,
    - Passing details to appropriate law enforcement bodies.
  6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
    - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
    - The percentage of [workers and/or candidates] supplied from audited businesses / our preferred supplier list,
    - The effectiveness of enforcement against suppliers who breach policies,
    - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
    - The level of modern slavery training and awareness amongst our staff.
  7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
  8. We would also recommend reading this in conjunction with our other policies, including our:
    - Corporate social responsibility policy,
    - Anti-bribery / corruption policy, and
    - Whistle-blowing policy.

This policy is reviewed annually.