

## **Extrastaff – Modern Slavery and Human Trafficking Statement Financial Year 2025/2026**

### **1. Executive Commitment**

Extrastaff recognises that modern slavery and labour exploitation present a significant and ongoing risk within the UK Industrial and Driving sectors. As a specialist recruitment provider operating in these environments, we place the prevention, detection, and elimination of modern slavery at the centre of our business strategy and operational delivery.

We adopt a zero-tolerance approach and are committed not only to compliance, but to leading best practice across our sector through robust systems, proactive risk management, and continuous improvement.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Directors.

### **2. Our Business and Operating Context**

Extrastaff is a UK-based recruitment business specialising in the provision of temporary and permanent labour within the Industrial and Driving sectors.

Our service model includes:

High-volume temporary labour supply

Workforce mobilisation across multiple client sites

Engagement with workers from a range of backgrounds, including potentially vulnerable groups

We recognise that these factors increase exposure to modern slavery risks, particularly in:

Labour-intensive roles

Shift-based and remote working environments

Supply chains involving multiple intermediaries

As a result, modern slavery risk management is embedded as a core compliance and operational priority.

### **3. Governance and Accountability**

Responsibility for modern slavery prevention sits at the highest level of the organisation.

The Board of Directors retains ultimate accountability

The Operations Director has executive responsibility for implementation

Anti Slavery Champion conducts specialist training and manages investigations.

A central compliance team conducts day to day checks, audits, and escalates where necessary.

Modern slavery risk is treated as a standing agenda item within compliance and operational reviews.

### **4. Industry-Leading Prevention Framework**

Extrastaff operates a multi-layered, preventative control framework designed to eliminate risk at every stage of the recruitment lifecycle.

Worker Onboarding Controls

100% verification of identity and right-to-work documentation

Face-to-face or verified remote registration processes

Cross-checking of personal data to identify anomalies (shared addresses, bank details, contact information)

No worker is placed without full compliance approval

System-Led Risk Detection

Use of internal systems to generate automated alerts and exception reporting

Data analysis to identify patterns consistent with exploitation

Ongoing monitoring throughout the worker lifecycle—not just at onboarding

Compliance Oversight

Centralised compliance approval for all candidate registrations  
Document validation and audit trails maintained for all workers  
Regular review and strengthening of onboarding controls  
Our approach is deliberately proactive rather than reactive, focusing on early identification and prevention.

#### **5. Client and Supply Chain Due Diligence**

We recognise that risk extends into the environments where workers are deployed.  
To mitigate this, we:  
Conduct pre-engagement due diligence on all clients  
Include binding contractual clauses relating to modern slavery and worker welfare  
Maintain ongoing dialogue with clients regarding working conditions  
Undertake spot checks and site engagement activities where appropriate  
Where standards are not met, we take immediate and decisive action including escalation to relevant authorities if necessary.

#### **6. Policies and Ethical Framework**

Our zero-tolerance approach is underpinned by a suite of policies that are actively enforced across the organisation:  
Whistleblowing Policy  
Modern Slavery Policy  
Anti-Bribery and Corruption Policy  
These policies are supported by clear reporting mechanisms and a culture of accountability.

#### **7. Training and Competency**

Extrastaff ensures that all relevant employees are trained to a high standard of awareness and competency.  
Training includes:  
Identification of modern slavery indicators  
Sector-specific risks within Industrial and Driving environments  
Reporting and escalation procedures  
Training is:  
Mandatory at onboarding  
Refreshed periodically  
Enhanced for high-risk roles (e.g. compliance, recruitment consultants)

#### **8. Reporting and Escalation**

We actively promote a speak-up culture. All employees, workers, and stakeholders are:  
Encouraged to report concerns without fear of retaliation  
Provided with clear escalation routes, including direct access to senior management  
All reports are:  
Treated confidentially  
Investigated promptly  
Escalated to external authorities where appropriate

#### **9. Monitoring, Audit and Measurable Effectiveness**

Extrastaff measures the effectiveness of its modern slavery controls through defined compliance activities and performance indicators, including:  
100% of workers subject to compliance verification prior to placement  
Regular internal audits and re-audits of compliance processes  
Spot checks across active assignments  
Monitoring of system alerts and exception reports

Investigation of all reported concerns

These measures ensure that our approach is evidence-based, transparent, and continuously improving.

**10. Continuous Improvement and Sector Leadership**

Extrastaff is committed to maintaining its position at the forefront of ethical recruitment practices.

Over the next 12 months, we will:

Expand client engagement and site oversight activity

Strengthen supply chain due diligence processes

Continue to align with emerging best practice and client expectations

Our objective is not only to protect workers within our own operations, but to raise standards across the Industrial and Driving recruitment sectors as a whole.

**11. Board Approval**

This statement has been approved by the Board of Directors and will be reviewed annually to ensure ongoing effectiveness.

Approved by: Dean Jeffery

Board of Directors, Extrastaff

Date: 3 March 2026

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