



cedar

# MODERN SLAVERY & HUMAN TRAFFICKING POLICY

August 2025



# Modern Slavery Policy 2025

## POLICY STATEMENT

This policy applies to all individuals working for or on behalf of Cedar Recruitment Ltd, (Registered address: Elsley Court, 20-22 Great Titchfield Street, London, W1W 8BE | Registered in England: 4665436) in any capacity. This includes employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and suppliers.

Cedar Recruitment Ltd strictly prohibits all forms of modern slavery and human trafficking within our operations and supply chains. We are committed to implementing and maintaining robust systems and controls to ensure that modern slavery does not occur within our organisation or among our suppliers. Furthermore, we expect our suppliers to adhere to the same high standards and to enforce these standards with their own supply chains.

## ORGANISATIONAL CONTEXT AND SUPPLY CHAINS

Cedar Recruitment Ltd operates as a recruitment agency within the UK, partnering with clients across various industries. Our supply chains include collaborations with employment agencies, service providers, and contractors, both domestically and internationally. We recognise that certain sectors and regions carry a higher risk of modern slavery, and we remain committed to identifying and addressing such risks proactively.

We recognise the potential risks associated with modern slavery in the sectors we recruit for, particularly in Finance, Procurement, and Supply Chain roles. To address these risks, we:

- **Client Due Diligence:** Encourage our clients to implement robust policies and processes to address modern slavery within their own operations and supply chains, adhering to the standards of the Modern Slavery Act 2015.
- **Hold Clients and Suppliers to Equal Standards:** Require that clients and suppliers demonstrate compliance with the same standards we uphold within our organisation when requested. This includes adherence to the Modern Slavery Act 2015 and equivalent ethical recruitment practices.
- **Risk Assessments by Sector:** Conduct sector-specific assessments to identify heightened risks of exploitation. Particular attention is paid to industries and roles where unregulated subcontracting, high-pressure environments, or vulnerable worker groups (e.g., migrant labour) are prevalent.
- **Supplier Screening:** Work with our clients and suppliers to ensure that their recruitment practices and supply chains meet the standards of the Modern Slavery Act 2015. This includes screening suppliers and requesting evidence of ethical labour practices, such as certifications or audit results.
- **Candidate Awareness:** Can provide guidance to candidates in high-risk sectors to help them identify and report potential exploitative practices within their roles when required. This ensures they understand their rights and have access to the appropriate reporting channels.

## MODERN SLAVERY AND HUMAN TRAFFICKING

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

# Modern Slavery Policy 2025

## COMMITMENTS AND EFFECTIVENESS INDICATORS

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- A zero-tolerance approach to modern slavery in our organisation and supply chains.
- The prevention, detection, and reporting of modern slavery as the responsibility of all individuals working for or on behalf of our organisation.
- Engaging with stakeholders and suppliers to address the risk of modern slavery in our operations and supply chains.
- Conducting risk-based assessments of suppliers, incorporating specific prohibitions against modern slavery where appropriate, and ensuring compliance through audits and due diligence processes.
- Taking appropriate action if individuals or organisations working on our behalf breach this policy, which may include remediation or terminating relationships.
- Timely review of this policy on an annual basis to reflect any legislative updates or emerging risks.
- Ensuring that all new employees read and agree to our staff handbook, which includes key information on modern slavery and business standards, within their first week of employment.
- Maintaining a whistleblowing mechanism to report concerns, where the absence of reports reflects positive staff and supplier alignment with our values and proactive adherence to modern slavery prevention measures.