



January 2026

## **Mploy Staffing Solutions Ltd – Tackling Modern Slavery and Hidden Labour Exploitation in Supply Chain Policy Statement**

Mploy Staffing Solutions Ltd (Mploy) are an accredited equal opportunities and ethical employer, and a Platinum Investor in People; we are committed to working closely with our clients in preventing and abolishing hidden labour exploitation and human trafficking in the supply chain, both internally and externally to the business.

Mploy is a large provider of temporary and permanent staff to the food industry, manufacturing, marine, engineering, hospitality, financial services and the care industry in the UK; we pride ourselves on compliance, sharing best practise, and building sustainable long-term relationships with customers, leading to understanding their business operations as well as the challenges of providing labour.

Mploy has 9 offices in the South of England, in Poole (Head Office), Christchurch, Christchurch Healthcare, Salisbury, Andover, Dorchester, Yeovil, Southampton and Taunton with plans for further growth in the coming years.

### **Supply Chain**

We provide recruitment services on a temporary and permanent basis to over 100 businesses on a weekly basis to a variety of sectors: food manufacturing, warehouse and logistics, general manufacturing, engineering, offices, hospitality and healthcare.

All workers supplied by us are directly sourced, interviewed face to face, pre-screened, assigned and paid by Mploy.

On rare occasions, we may engage with a second-tier provider. In this case the provider will be audited by Mploy, they will be a holder of a GLAA license and will enter into a contract with Mploy.

Subcontractors and suppliers to Mploy, such as providers of IT services, cleaning and maintenance, or providers of PPE are sourced locally and appointed for the duration of a contract.

### **Policies**

Mploy's Ethical Approach to Recruitment

Equal Opportunities & Race Relations Policy

Diversity, Equality and Inclusion Policy

Whistleblowing Policy

Training and Development Policy

## Mploy's Ethical Approach to Recruitment

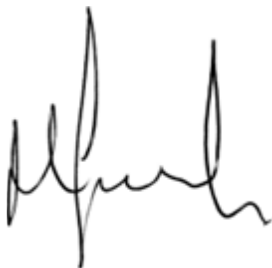
Diversity is the description of a range of visible and non-visible differences that exist between people. Managing diversity harnesses these differences, creates a productive environment in which everybody feels valued, where talents are fully utilized and in which organizational goals are met.

Diversity covers the following areas:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Equality is a harmonious balance of the above diversity areas within our community. Mploy Staffing Solutions embraces the spirit of equal opportunities and diversity. We seek guidance from the Equal Opportunities Commission and manage all areas of diversity which plays an important part within our recruitment process. We communicate the principals of equality and diversity to our clients when recruiting on their behalf.

**SIGNED:**



**SIGNED:** \_\_\_\_\_

Mark James Nash (FREC (Financial Director))

## Equal opportunities & race relations policy

Mploy Staffing Solutions as an employer is committed to equal opportunities for all applicants, and for employees in its service. The seriousness of this commitment is reflected in Mploy's policies and practices. This policy deals explicitly in employment issues.

Equality of opportunity for all sections of its workforce is an essential aim for Mploy. This means recognising the inequalities which people suffer and taking action to reduce them. All staff have a role to play in ensuring fairness towards colleagues and customers.

This commitment is integral to the provision of all Mploy's services and employment conditions of each and every member of staff. Mploy expects all of their staff to promote equality in the work place and in the services it delivers. In this way, Mploy can help redress inequality.

Equal Opportunities means access to jobs, service, information and participation for everyone. Mploy recognise that because some groups of people experience prejudice and discrimination that to make opportunities a reality affirmative action is required. Mploy mentions some groups in particular because they are the people who have commonly been disadvantaged. Mploy's commitment to all members of the community is recognition of the difficulties and inequalities which these groups continue to face. Mploy Staffing Solutions declares that no job applicant or employee or patient shall receive less favorable treatment than another on grounds of:

Sex, sexual orientation, marital status, responsibility for dependents, disability, national origin, age, race, religion, political or trade union affiliations etc.

The policy, and action which arise as a result of it, takes account of all statutory requirements e.g. Race Relations Act 1976 and Sex Discrimination Act 1975 (amended), the Employment Act 1980 (amended), the Disability Discrimination Act (1995) and Codes of Practice. The policy has incorporated the spirit of the Equal Opportunity Codes of Practice published by the Equal Opportunities Commission and the Commission for Racial Equality.



**SIGNED:**

\_\_\_\_\_  
Mark James Nash (FREC (Financial Director))

# Diversity, Equality and Inclusion Policy

Diversity is the description of a range of visible and non-visible differences that exist between people. Managing diversity harnesses these differences, creates a productive environment in which everybody feels valued, where talents are fully utilised and in which organisational goals are met.

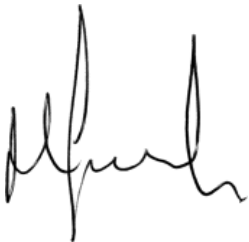
Diversity covers the following areas:

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- **disability**
- **gender reassignment**
- **marriage and civil partnership**
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- **race**
- **religion or belief**
- **sex**
- **sexual orientation**

Equality is a harmonious balance of the above diversity areas within our community. Mploy Staffing Solutions embraces the spirit of equal opportunities and diversity. We seek guidance from the Equal Opportunities Commission and manage all areas of diversity which plays an important part within our recruitment process. We communicate the principals of equality and diversity to our clients when recruiting on their behalf.

We practice and promote inclusion by providing equal access to opportunities and resources for people who might otherwise be excluded or marginalised, such as those who have physical or intellectual disabilities and members of other minority groups.

Signed:

A handwritten signature in black ink, appearing to read 'Mark James Nash', written in a cursive style.

Mark James Nash, FREC (Financial Director)

# Whistleblowing Policy

## **1. INTRODUCTION**

- 1.1 Mploy Staffing Solutions Ltd is committed to conducting its business with honesty and integrity and aims to achieve the highest possible standards of service and ethical standards in all of its practices.
- 1.2 We expect all staff to maintain the same high standards too; however, all organisations face the risk of things going wrong and sometimes malpractice and wrongdoing can take place. We take malpractice and wrongdoing very seriously and aim to prevent and eliminate any wrongdoing or malpractice within the organisation.
- 1.3 We therefore encourage all staff to raise any concerns they may have about malpractice or wrongdoing within the organisation freely and without fear of suffering a detriment or dismissal to enable us to eliminate and prevent wrongdoing or malpractice within the organisation.
- 1.4 We will treat any concerns raised seriously and will protect and support any individual who makes a disclosure in line with this policy.
- 1.5 This policy does not form part of any contract; Mploy Staffing Solutions Ltd reserves the right to amend this policy at any time without prior notice.

## **2. WHO CAN RAISE A CONCERN UNDER THIS POLICY?**

- 2.1 This policy applies to all current and former employees, workers, officers, consultants, contractors of our business, including home workers, trainees, apprentices, agency workers, casual workers and limited company contractors.
- 2.2 No qualifying length of service is required in order to raise a concern under this policy.

## **3. WHEN TO USE THIS POLICY**

- 3.1 This policy should be used to report concerns of malpractice or wrongdoing in relation to our organisation's activities where you have information which you reasonably believe tends to show one or more of the following:
  - that a criminal offence has been committed, is being committed or is likely to be committed; or
  - that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject; or
  - that a miscarriage of justice has occurred, is occurring or is likely to occur; or
  - that the health or safety of an individual has been, or is being or is likely to be endangered; or
  - that the environment has been, is being or is likely to be damaged; or
  - that any of the above malpractices have been, are being or are likely to be deliberately concealed. This applies whether the malpractice has already occurred, is currently in progress, or is likely to happen in the future.

- 3.2 You must reasonably believe that the disclosure is being made in the public interest.
- 3.3 It doesn't matter if you are mistaken about your concern but you must have information that tends to show some malpractice or wrongdoing rather than an opinion or a feeling.

#### **4. DISCLOSURES THAT ARE NOT COVERED BY THIS POLICY**

- 4.1 You will not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter that is subject to legal, professional privilege (for example, correspondence between Mploy Staffing Solutions Ltd and our lawyers regarding a specific case).
- 4.2 If your concern relates to your own treatment as an employee of Mploy Staffing Solutions Ltd, including personal circumstances at work, you should raise it under our grievance procedure instead, unless you reasonably believe that the matter is in the public interest.
- 4.3 If your concern relates to your own treatment or personal circumstances at work but you are not an employee of Mploy Staffing Solutions Ltd, you should use our complaints procedure instead of the grievance procedure. Our complaints procedure is included in the Terms & Conditions of Engagement of Contractors.
- 4.4 If you wish to raise a concern of suspected malpractice or wrongdoing in relation to a hirer's activities you may need to raise the concern directly with the hirer instead.
- 4.5 Any other concerns about our services generally which are not related to the types of wrongdoing or malpractice covered by this policy should be raised using our complaints procedure instead.

#### **5. HOW TO RAISE A CONCERN**

- 5.1 If you have any concerns of the types of malpractice or wrongdoing covered by this policy, you should in the first instance make a disclosure to your immediate superior. Agency workers should disclose concerns to the consultant who is responsible for managing their assignment.
- 5.2 If, for any reason, you feel that you cannot tell your immediate superior, or in the case of an agency worker the consultant responsible for managing your assignment, you should raise the issue with Branch Manager or Board Director, or in case of an agency worker the concern can be addressed to The Quality Department, Mploy Staffing Solutions Ltd, Vision House, 236-244 High Street North, Poole, BH15 1EA.
- 5.3 If you have made a disclosure and are still concerned, or the matter is so serious that you feel you cannot discuss it with either of the two persons named above, you should raise the matter with the following member of management: Managing Director, Mploy Staffing Solutions Ltd, Vision House, 236-244 High Street North, Poole, BH15 1EA.
- 5.4 A disclosure of a concern can be made by telephone, in person or in writing (including by email). However, it is preferable for the disclosure to be made in writing so that we can keep an exact record of your concern.
- 5.5 You are not expected to prove the truth of your concern beyond reasonable doubt or provide any evidence; however, you will generally need to provide the following information as a minimum:
  - the nature of the concern;
  - why you believe it to be true;
  - the background and history of the concern; and
  - relevant dates where possible.

- 5.6 You can raise any concerns anonymously; however, we encourage you to give your name when reporting your concern wherever possible because it may be more difficult for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous.
- 5.7 You may wish to consider discussing your concern with a colleague before raising it formally under this policy. You can also choose to raise a concern under this policy alone or with a colleague; however, it is in the interests of all parties to maintain confidentiality once you have raised a formal concern.

## **6. HOW WE RESPOND TO CONCERNS RAISED UNDER THIS POLICY**

- 6.1. We are committed to ensuring that all disclosures raised in accordance with this policy will be dealt with objectively, consistently, fairly and professionally.
- 6.2. We will take the time to listen to any issues raised and arrange a meeting as soon possible to discuss your concern (unless the concern has been raised anonymously). The aim of the meeting will be to establish the background and facts in order to help us decide whether and how to carry out any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.
- 6.3. Any concerns you raise in line with this policy will be recorded in our Head Office Central Database.
- 6.4. After the meeting, we will decide how to respond. This will usually involve making internal enquiries in the first instance, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time.
- 6.5. We will keep you informed of the progress of the investigation as it is carried out and when it is completed, and give you an indication of the timescale for any actions or next steps that we may take. We cannot inform you of any matters that would breach any duty of confidentiality owed to others.
- 6.6. We will consider any concerns raised anonymously at our discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources. However, concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. It may also be difficult for us to provide you with feedback if you cannot be contacted.
- 6.7. If disciplinary or other proceedings follow the investigation, we may need to ask you to come forward as a witness to help us take appropriate action to end the wrongdoing.

## **7. CONFIDENTIALITY**

- 7.1 All concerns raised will be treated as confidential and every effort will be made not to reveal the identity of any individual who raises a concern. Unless the law requires otherwise, we will only make disclosures to third parties or other staff with your consent.

## **8. RAISING YOUR CONCERN EXTERNALLY (EXCEPTIONAL CASES)**

- 8.1 The main purpose of this policy is to give all our staff the opportunity and protection they need to raise concerns internally. We would expect that in almost all cases raising concerns internally would be the most appropriate course of action in order to resolve the issue.

- 8.2 However, if for whatever reason you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true and in the public interest, the law recognises that it may be appropriate for you to raise the matter with another approved person, such as a regulator, professional body, or an MP. A list of the relevant prescribed people and bodies that you can raise a concern with is available on the GOV.UK website via the following link:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/510962/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510962/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf).

- 8.3 We strongly encourage individuals to seek appropriate advice before reporting a concern to an external person. Public Concern at Work is a leading independent charity whose main objective is to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice and operate a confidential helpline. ACAS also operate a free confidential helpline that you can contact for advice. The contact details for both organisations are set out in the information and contacts section under paragraph 10 below.

## **9. PROTECTION AND SUPPORT FOR THOSE RAISING CONCERNS**

- 6.1 We hope that all staff will feel able to voice their concerns freely under this policy.
- 9.2. Mploy Staffing Solutions Ltd is committed to good practice and high standards and to being supportive of staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.3. Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If you believe that you have suffered such treatment, you should inform Board Directors immediately.
- 9.4. Mploy Staffing Solutions Ltd. will not tolerate any harassment or victimisation of individuals who raise concerns about wrongdoing or malpractice in the workplace. No member of staff may threaten or retaliate against an individual who has raised a concern. Any person involved in such conduct may be subject to disciplinary action and in some cases will be liable to a claim for compensation brought against them personally.
- 9.5. To ensure the protection of all our staff and the integrity of our business, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or not made in the public interest may also be subject to disciplinary action.
- 9.6. If you are not happy with the way in which a matter has been addressed or dealt with you should raise it formally using our complaints procedure. Employees of Mploy Staffing Solutions Ltd. can use our grievance procedure to address the issue instead.

## **10.FURTHER INFORMATION AND CONTACTS**

- 10.1 If you have any queries about the application of this policy, please contact you Branch Manager in the first instance.
- 10.2 Public Concern at Work is a source of further information and advice. It also provides a free helpline offering confidential advice on 020 7404 6609. Further information is available on their website at [www.pcaw.co.uk](http://www.pcaw.co.uk).
- 10.3 The Advisory, Conciliation and Arbitration Service (ACAS) also has a free helpline that you can contact for further advice. The ACAS telephone number is: 0300 123 1100 and the helpline is open Monday to Friday from 8am to 8pm and Saturday from 9am to 1pm.The website can be found here: [www.acas.org.uk](http://www.acas.org.uk).

10.4 If you are a member of a recognised trade union, you can also seek information and advice from your trade union representative.

Signed:



Mark James Nash, FREC (Financial Director)

## Training and Development Policy

### **Policy brief & purpose**

Mploy's **Staff Training and Development company policy** refers to the company's learning and development programs and activities.

Mploy understands that its employees need to replenish their knowledge and acquire new skills to do their jobs better. This will benefit both them and the company. We want them to feel confident about improving efficiency and productivity, as well as finding new ways towards personal development and success.

### **Scope**

This policy applies to all permanent, full-time or part-time, employees of the company. Employees with temporary/short-term contracts might attend trainings at their manager's discretion.

This policy doesn't cover supplementary employees like contractors or consultants.

### **Policy elements**

All employees, managers and Training Officers should all collaborate to build a continuous professional development (CPD) culture. It's an employee's responsibility to seek new learning opportunities. It's a manager's responsibility to coach their teams and identify employee development needs. And its Training Officers responsibility to facilitate any staff development activities and processes.

### **What do we mean by training and development?**

In general, we approve and encourage the following employee training activities:

- Formal training sessions (individual or corporate)
- Employee Coaching and Mentoring
- Participating in conferences
- On-the-job training
- Job shadowing

### **Individual training programs**

The company has certain provisions regarding individual training programs. All employees that wish to participate in external training programs relevant to their jobs should express their interest by writing to Company Directors for approval and request of participating in training costs.

Employees may have to bring proof of attendance and provide copies of certificates obtained.

All trainings should consider what employees need and how they can learn best. This is why, we encourage employees and managers to consider multiple training methods like workshops, e-learning, lectures and more.

### **Corporate training programs**

We might occasionally engage experts/external consultant to train our employees. The company will cover the entire cost in this case.

The company also has got a training plan delivered by nominated internal Training Officers and this program includes:

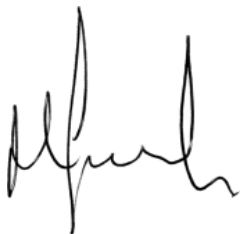
- Tackling Modern Slavery in a supply chain
- Data Protection
- Eligibility to work in the UK
- Immigration rules in the UK
- Customer service
- Sales
- Resourcing
- Interviewing
- Multi-cultural communication in business

### **Other types of training**

Both employees and their managers are responsible for continuous learning. Employees should show willingness to improve by asking their managers for direction and advice. Managers should do the same with their own superiors, while encouraging and mentoring their subordinates.

Employees and managers are responsible for finding the best ways to CPD. They can experiment with job rotation, job shadowing and other types of on-the-job training (without disrupting daily operations). We also encourage employees to use their rights for self-paced learning by asking for educational material and access to other resources within approved budget.

Signed:

A handwritten signature in black ink, appearing to read 'Mark James Nash', written in a cursive style.

Mark James Nash, FREC (Financial Director)

### **Procedures and Training**

In line with the Modern Slavery Act 2015, Mploy have implemented the following good practice processes and procedures to identify and deter hidden labour exploitation:

- This policy is to cover all Mploy offices and will apply to any new business branches opened in the future.
- Mploy appointed a Director to oversee this policy – Kat Mieszkowska (Managing Director) – who acts as a Stronger Together Advocate and who undertook training in Stronger Together Advanced Business Partner. Kat Mieszkowska is also responsible for the training of internal staff on the identifying and reporting of potential workers exploitation.
- The Mploy Director responsible for implementation of the policy has attended the “Tackling Modern Slavery in UK Businesses and Supply Chains” training and commit to keep up to date with additional training requirements.
- Mploy promotes honest, ethical, free from abuse and friendly employment practices.
- Mploy commits to cooperating with GLAA, police, local authorities, charities, clients, workers, and local community to prevent modern slavery, human trafficking and third-party labour exploitation.
- Mploy’s registration procedure demands all application forms to be filled in person at the Mploy office by candidates and the forms are not allowed to be taken off-site.
- All Mploy’s candidates are interviewed face to face in office locations.
- Mploy conducts all required right to work checks in line with legal requirements.
- Mploy does not charge any fees to candidates and workers for finding work.
- Mploy provides workers with a free of charge PPE for their assignments with Mploy.
- Mploy will not use any one individual person or other organisation to act as a second-tier supplier to Mploy without written confirmation that workers provided by them are not being charged a work finding fee and without conducting due diligence checks confirming that potential second tier supplier is eligible to provide workers within the specified sector and holds relevant licenses.
- Mploy does not accept 3<sup>rd</sup> party bank details and assists their workers in opening their own UK bank accounts.
- Mploy encourages their workers (and assists them) to apply for a National Insurance number.
- All Mploy’s internal employees responsible for directly recruiting workers are trained to be aware of third-party labour exploitation and are able to identify the signs which may be indicators of exploitation.
- All Mploy’s internal employees are aware of the reporting procedure.
- All Mploy’s internal employees responsible for recruiting workers are trusted and competent members of staff who have read and signed Recruiter Compliance Principles.
- Workplace posters providing information on tackling “Hidden Labour Exploitation” are clearly displayed in all Mploy office locations.
- Worker leaflets on tackling “Hidden Labour Exploitation” available in multiple languages are distributed to all Mploy’s candidates during their registration at all Mploy’s offices.
- Mploy’s interview procedure includes a questionnaire aiming at identifying potential exploitation of job applicants; any answers provided are carefully checked by Recruiters to ensure the safety of the candidate.
- Mploy’s workers’ inductions and training programs include information on tackling hidden labour exploitation.
- All Mploy’s employees and workers are positively encouraged to report any cases of potential labour exploitation either in person or anonymously.

Signature of person responsible for policy: -

SIGNED:

A handwritten signature in black ink, appearing to read 'Mark James Nash', written in a cursive style.

Mark James Nash FREC (Financial Director)