

## Modern Slavery Statement



This statement is made as part of XCL Group Ltd commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how XCL Management Ltd operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

David Gallagher

Managing Director

### 1 Our Business

XCL Group is a limited company operating in the recruitment sector. We provide introduction services / supply temporary workers in the general staffing, Manufacturing, Engineering, Automotive and Office Services sectors.

XCL Management is an independent business.

#### 1.1 Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies. We do not supply work-seekers to hiring companies through any intermediaries.

The hiring companies that we work with are located in UK and local areas. The work-seekers / worker's we supply live in the UK and local area to where they work.

#### *Other relationships*

As part of our business, we also work with the following organisations:

- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com)) and Institute of Recruitment Professionals ([www.rec-irp.uk.com](http://www.rec-irp.uk.com))

### 2 Our Policies

XCL Group Ltd is not obligated under the requirements of the regulation to have a modern slavery policy, however we chose to ensure we meet the regulations in our business through ongoing review, monitoring and auditing of our staff, workers and clients we work with.

In addition, XCL has the following policies which incorporate ethical standards for our staff [and our suppliers].

- Equal opportunities
- Bullying & Harassment
- Anti-bribery
- Whistleblowing
- Fair Treatment
- Complaints policy

- **Policy development and review**

XCL's policies are established by our Directors, based on advice from HR professionals, industry best practice and legal advice. We review our policies annually, or as needed to adapt to changes.

### **3 Our Processes for Managing Risk**

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.

Our staff are encouraged to bring any concerns they have to the attention of management.

### **4 Our Performance**

As part of monitoring the performance of XCL Management, we track the following general key performance indicators:

- the level of modern slavery training and awareness amongst our staff
- We do not engage with third party suppliers including umbrella companies.

### **5 Our Training**

All of our staff receive training and support that is appropriate to their role. In particular:

1. Our Senior Management team / Directors receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
2. Our internal staff undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
3. 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.

As part of this, our staff are encouraged to discuss any concerns that they have.

Training is refreshed regularly.

