

#### SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our corporate activities. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We all have a responsibly to be alert to the risks, however small, in our business and in the wider supply chain.

This statement sets out Kingston Smith's actions to understand all potential modern slavery risks related to business and to ensure steps are maintained to prevent slavery and human trafficking.

#### Our business

QCS Staffing are an established niche recruitment services company, predominantly specialising in the life sciences, energy and ICT industries sectors. QCS Staffing deliver their recruitment services to clients throughout Europe, North Africa, the Middle East and Asia and are based in Hertfordshire, UK.

Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities and that they are paid directly into an appropriate bank account.

### Our supply chains and supplier adherence to our values

The relationship with our clients and consultants have been developed over a number of years and is built upon mutually beneficial factors, where we have close, personal links and contact with the business decision makers.

When we have new clients introduced to the company we pre-qualify them through a diligence process, relating to company location, size, HS&E compliance in addition to taking references from other sources to establish that they are suitable and comply with our standards.

To date we have not been made aware of any human trafficking / slavery activities within the supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

## Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.





# Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential *risk* areas in our supply chains.
- Protect whistle blowers.

## **Training**

We have stated our zero tolerance to slavery and human trafficking. To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business our Anti-Slavery Policy is available in our Employee Handbook and on the Intranet.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2016.

