

# Doing the right thing:

A Seymour John Policy Document

## Modern Slavery and Human-Trafficking Policy

Updated November 2025

Seymour John will always seek to protect and promote the human rights and basic freedoms of all employees and agents, and all those whose work contributes to our success, including our suppliers and clients. As such, we strive to create a fair, inclusive environment where everyone has opportunities to succeed, and no one is exploited.

## Scope

This policy applies to all employees, temporary workers, contractors, consultants, and partners ("Seymour John Representatives"), and all operating subsidiaries. It should be read in conjunction with our:

- Anti-Bribery Policy
- Equal Opportunities Policy
- Ethics, Integrity and Business Standards Policy
- Whistleblowing Policy
- Operational procedures documentation

## Overview

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Human trafficking is where a person arranges or facilitates the travel of another with a view to that person being exploited.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, temporary workers, contractors, and suppliers.

## Our commitment

We oppose all forms of slavery and trafficking and are fully committed to compliance with the Modern Slavery Act 2015 as well as the UN Guiding Principles on Business and Human Rights. As such, we are committed to acting ethically and with integrity in all our business dealings and relationships, ensuring modern slavery is not taking place anywhere in our own business, or in any of our supply chains. We expect everyone working with us or on our behalf to support and uphold our commitment to safeguard against modern slavery.

Specifically, we are committed to:

- Adherence to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association



## Governance & accountability

The Seymour John senior management team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all our people comply with it.

## Compliance with the Policy

As a consultancy services company, working with a limited number of suppliers, our exposure to the risk of modern slavery is low. And while as a specialist recruitment company ours is a people business, all our employees, contractors and candidates are rigorously screened and background checked as part of the due diligence of our recruitment processes.

The prevention, detection, and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.

- **Rigorous Right-to-Work Checks:** All candidates undergo strict identity verification, visa checks in compliance with Home Office and public sector framework requirements.
- **Contractual Safeguards:** All contracts include clauses prohibiting slavery, trafficking, and exploitation, consistent with the public sector framework terms we adhere to.
- **Training & Awareness:** Staff receive training to identify indicators of modern slavery and how to escalate concerns appropriately.
- **Reporting Mechanisms:** We maintain confidential channels for whistleblowing and reporting of suspected cases of exploitation (see our Whistleblowing Policy).

If you are in any doubt about whether a particular act or working conditions in any of our business relationships may contravene any aspect of this policy, then err on the side of caution and report it to the Seymour John senior management team.

## Breaches of the Policy

Any employee who breaches this policy may be subject to disciplinary action. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

To be clear, Seymour John prohibits:

- Any threat of violence, harassment and intimidation
- The use of worker-paid recruitment fees
- Compulsory overtime
- Child labour
- Discrimination of any kind
- Confiscation of workers' original identification documents

## Continuous improvement

We will:

- Review this policy annually to reflect changes in legislation, public sector framework requirements, and best practice

- Engage with industry bodies, regulators, and clients to strengthen our approach
- Incorporate feedback from audits and stakeholder engagement into our processes and procedures

This statement is published in line with section 54(1) of the Modern Slavery Act 2015 and will be reviewed and updated annually.