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ANTI-MODERN SLAVERY POLICY



Anti-Modern Slavery Policy

1. Policy Statement and Scope

Slavery is a violation of human rights. It is a generic term for activities where one person obtains or holds another person in compelled service. In the UK, modern slavery can include:

- domestic slavery
- forced and compulsory labour
- sexual exploitation, and
- human trafficking

all of which constitutes illegal criminal activity as it seeks to deprive a person (whether an adult or child) of their freedom, for personal or commercial gain, by others.

We, at Quiss, are fully committed to upholding the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. Transparency, honesty and behaving in an ethical manner reflects our core values and underpins our relationship with our clients, suppliers and other partners.

This policy exists to:

- a) set out the expectations of the Company and those working for it, in observing and upholding its zero-tolerance position to any form of exploitation
- b) act as a source of information and guidance for all employees working for Quiss
- c) act as a clear statement to all our business partners: clients, suppliers, contractors and any third parties

This policy applies to all employees of Quiss. It also extends to individuals working on our behalf, for example, agency staff or contractors or other individuals representing Quiss.

Quiss expects all employees and associated individuals to maintain the highest standards of business conduct and are expected to behave honestly and with integrity. This expectation also extends to those we partner and work with: our clients, suppliers, contractors and any third parties.

2. Modern Slavery Act 2015

The Act uses various terms to describe 'modern slavery':

- where ownership is exercised over a person
- servitude- where there is an obligation to provide services by coercion
- forced or compulsory labour – where work, or service extracted from a person under menace of penalty or physical punishment



- human trafficking – arranging or facilitating the travel of a person with a view to exploiting them

Characteristics and behaviours of people who are victims of modern slavery may include:

- appearing to be malnourished, tired, scruffy or unwashed
- wearing unsuitable clothes for work, or for the weather, or wearing the same clothes every day
- looking like they are under the control of someone else and being reluctant to interact with others e.g. reluctant to make eye contact or talk to others
- having few personal belongings
- appearing withdrawn, or frightened, or showing signs of abuse
- appearing fearful, uneasy, or anxious and distrustful of authorities
- appearing to have untreated injuries
- allowing others to answer questions put to them
- frequently being dropped off or picked up at unsociable hours
- that the individual
 - doesn't know their home or work address
 - has limited social contact or contact with their family
 - never seems to have any or much money, despite working long hours
 - doesn't have possession of their passport, driving license or other identification documents
 - fails to offer a coherent account or changes their accounts of events
 - repeats a story that you have heard elsewhere - as if they and others have been instructed to learn it.

According to the National Crime Agency, 54% of referrals for exploitation wholly in the UK, were for UK nationals – 78.5% of which involved criminal activity (www.nationalcrimeagency.gov.uk/threats-2025).

It is critical therefore that we all understand what constitutes modern slavery and how to recognise the signs of someone who might be a victim of modern slavery, so the necessary support, rehabilitation and protection can be sought for the victim. It can also help bring the perpetrators of such illegal criminal activity to justice.

3. General Principles

We, at Quiss, are committed to upholding the highest standards of professional integrity, in all our business dealings and relationships. This is reflected in our core values embedded throughout the business, in our policies, practices and operations both internally and externally.



We are an equal opportunities employer, fully committed to creating and ensuring an inclusive and respectful working environment for all. The Company's strength and success is built on the effort, integrity and team spirit of its employees and its strong ethical sense. Our culture, management team and policies reflecting current employment legislation and HR best practice, enable our staff to feel confident that they can report concerns without any fear of retribution.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and embeds HR best practice to safeguard employees from any abuse or coercion.

Quiss recognise that as an ethical organisation, we have a responsibility to be alert to the risks of exploitation and in the wider supply chain. As a purchaser of goods and services, we do not knowingly enter business with any organisation, in the UK or abroad, which supports or is found to be involved in slavery, servitude and forced or compulsory labour.

4. Supply Chain

Quiss procure goods and services from the UK and a limited number of overseas suppliers. Our procurement procedures are in line with guidance on best practice from the Chartered Institute of Procurement and Supply (CIPS).

Quiss build relationships with our suppliers to ensure they understand our values and comply with our expectations and commitment to protect human rights. As part of our procurement processes, we require our suppliers to ensure they uphold our values and commitment.

5. Due Diligence

As an ethical company, we seek to ensure that we do not inadvertently support Modern Slavery or human trafficking or any form of exploitation, by undertaking the necessary due diligence and adopting a proactive approach to identifying and mitigating risks. We do this by ensuring:

- all staff are legally entitled to work in the UK by carrying out the necessary due diligence e.g. confirmation of identity and right to work checks
- should recruitment agencies be used to find staff, they are required to also follow the same due diligence e.g. they will look to confirm the identity and right to work of individuals who are placed within Quiss.
- all staff receive a contract of employment (that is sent directly to the employee) where they understand the terms and conditions of their employment, including the terms of their notice, should they wish to leave their employment
- employees are paid at least the National Living Wage



- we check the bank account details that are supplied by the employee matches the name of the employed individual
- we carry out appropriate due diligence on suppliers and contractors before engagement by
 - requesting suppliers to confirm their commitment to ethical trading and compliance with the Modern Slavery Act 2015, through our supplier questionnaire and ask for supporting documentation. This is an integral part of our new supplier on-boarding process.
 - take action (such as terminating the contract, reporting to the relevant authorities) if we find any supplier or third party is found to be involved in modern slavery or human trafficking
- we maintain clear and accessible reporting channels for raising concerns

6. Awareness and Training

This policy is available to all staff through Q-Hub. Quiss also provide online training on the Modern Slavery Act 2015, so individuals are aware of the appropriate action to take if they suspect any form of exploitation. Our procurement team will also undertake specific training on ethical procurement.

Our zero-tolerance approach to modern slavery and human trafficking will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations. This policy is also available on our website.

7. Reporting Suspicions of Slavery

Anyone with concerns over any form of exploitation, can:

- speak to HR
- go through the Company's Whistleblowing policy
- contact the Modern Slavery Helpline on 08000 121 700
 - Website: <https://www.modernslaveryhelpline.org/report>
- contact the Gangmasters and Labour Abuse Authority on 0800 432 0804
- contact Crimestoppers on 0800 555 111 or
- ring the Police: 999

8. Monitoring and Reviewing

The Director of Operations has the overall responsibility for monitoring the effectiveness of this policy and will ensure it is reviewed every two years to reflect current legislation and HR best practice.

This policy does not form part of an employee's contract of employment and may be reviewed and amended at any time.

