



# This is our **MODERN SLAVERY** 2023/2024 Commitment

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1st Pay Limited is Registered in England & Wales | Registration Number: 14833948

Correspondence Address | The Mille | 1000 Great West Road | Brentford | Middlesex | England | TW8 9DW

Registered Address | 749a | Ormskirk Road | Wigan | England | WN5 8AT





**1st Pay Limited has taken steps to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.**

In accordance with Section 54, Part 6 of the Modern Slavery Act 2015 (the Act), this statement sets out the steps that 1st Pay Limited ("the Company") has taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business. This statement is in respect of 1st Pay Limited's financial year ended 31 December 2023 and was approved by the Board of Directors on 18 April 2024.

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## 1. Introduction

1st Pay Limited ("the Company") is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chains. This policy outlines our commitment to act ethically and with integrity in all our business dealings and relationships.

## 2. Purpose

The purpose of this policy is to ensure that the Company complies with the Modern Slavery Act 2015 and to set out the steps the Company is taking to prevent modern slavery and human trafficking.

## 3. Scope

This policy applies to all employees, contractors, suppliers, and any other parties working on behalf of the Company.

## 4. Definitions

- **Modern Slavery:** Encompasses slavery, servitude, human trafficking, and forced labor as defined by the Modern Slavery Act 2015.
- **Human Trafficking:** The recruitment, transportation, transfer, harboring, or receipt of persons by means of threat, force, coercion, abduction, fraud, or deception for the purpose of exploitation.

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## 5. Company Commitment

1st Pay Limited commits to:

- Complying with the Modern Slavery Act 2015.
- Acting ethically and with integrity in all business dealings.
- Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our business or supply chains.
- Ensuring transparency in our approach to tackling modern slavery.
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## 6. Responsibilities

- Management: Responsible for implementing this policy, ensuring compliance, and providing the necessary resources.
- Employees: Expected to report concerns and adhere to the principles outlined in this policy.
- Suppliers and Contractors: Required to comply with the principles of this policy and are subject to due diligence and regular audits.

## 7. Due Diligence

The Company will:

- Conduct risk assessments to identify parts of the business and supply chains most at risk of modern slavery.
- Evaluate the modern slavery and human trafficking risks of each new supplier.
- Periodically review the risks associated with our supply chains.

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## 8. Training and Awareness

- Provide training to employees to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business.
- Raise awareness of modern slavery issues among suppliers, contractors, and business partners.

## 9. Reporting

- Employees are encouraged to report any concerns regarding modern slavery in any parts of our business or supply chains to their line manager or through the Company's whistleblowing procedure.
- The Company will investigate reported concerns promptly and take appropriate action.

## 10. Monitoring and Review

The Company will:

- Regularly review the effectiveness of the policy and update it as necessary.
- Monitor and assess our compliance with this policy through audits and reviews.

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## **11. Compliance**

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract.

## **12. Approval**

This policy has been approved by the Board of Directors of 1st Pay Limited and is reviewed annually.

### **Review Date: 20th April 2024**

This policy is accessible to all employees and is part of our commitment to ensure transparency and integrity in all our operations.

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