



# **Modern Slavery & Preventing Hidden Labour Exploitation Policy 2026**

## **POLICY STATEMENT**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015.

Cando Personnel Ltd commits to developing and reinforcing a dedicated approach to tackling hidden labour exploitation.

Hidden labour exploitation is defined as the exploitation of job applicants and / or workers by a third-party individual or gangs other than the employer or labour provider, including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

Cando Personnel Ltd acknowledges responsibility to comply with all principles of the Modern Slavery Act 2015, the International Labour Organisation's core conventions and UN Global Compact and will perform due diligence to provide transparency throughout organisation.

## **Purpose**

The purpose of this policy is to eliminate candidates being exploited or trafficked by third-party individuals or gangs and to reinforce a dedicated approach to tackle it.

This Policy is also to spread awareness and provide clarity on the company's processes and commitments to shield workers from hidden labour exploitation to all staff members of Cando Personnel Ltd with responsibility for recruiting and managing workers, Agency Workers engaged on a Contract for Services, Candidates and Clients.

## **Responsibility**

Directors, Managers and all Cando Personnel staff who are authorised for recruiting worker holds responsibility in implementing and spreading awareness of this policy.

## **Policy Commitments**

Cando Personnel Limited is committed to:

- Ensuring all workers receive at least the National Minimum Wage, as applicable
- Conducting robust right-to-work and identity checks in line with UK legislation
- Ensuring recruitment, labour sourcing, and placement activities are carried out only by trained, competent, and trusted staff
- Prohibiting the charging of work-finding or recruitment fees to candidates or workers under any circumstances
- Not engaging with any individual or organisation to source workers without first confirming that no fees are charged to workers
- Monitoring key risk indicators, including shared addresses, bank details, or contact information, that may indicate exploitation
- Providing appropriate information, guidance, and training to staff, supervisors, and workers on identifying and reporting modern slavery risks
- Encouraging workers to speak freely and confidentially about concerns without fear of retaliation
- Protecting whistle-blowers and acting promptly and appropriately on all reports
- Reporting suspected cases of modern slavery or labour exploitation to relevant authorities, including the Gangmasters & Labour Abuse Authority (GLAA) and the police
- Not knowingly supporting or engaging with any business involved in slavery or human trafficking

The board of Directors have overall responsibility for ensuring the implementation of this policy, which will be reviewed at least annually or as legislation demands and changes communicated to employees as required.

Approved by: Partha Panda  
Managing Director  
Date: February 2026