



**i**con people  
— RECRUITMENT —

**MODERN SLAVERY AND  
HUMAN TRAFFICKING STATEMENT**

**FINANCIAL YEAR 2025/2026**

## 1. EXECUTIVE COMMITMENT

Icon People Recruitment Limited recognises that modern slavery and labour exploitation present a significant and ongoing risk within the UK Industrial and Driving sectors. As a specialist recruitment provider operating in these environments, we place the prevention, detection, and elimination of modern slavery at the centre of our business strategy and operational delivery.

We adopt a zero-tolerance approach and are committed to acting with compliance, but to leading best practice across our sector through robust systems, proactive risk management, and continuous improvement.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Directors.

## 2. OUR BUSINESS AND OPERATING CONTEXT

Icon People Recruitment Limited is a UK-based recruitment business specialising in the provision of temporary and permanent labour within the Industrial and Driving sectors.

Our service model includes:

- High-volume temporary labour supply
- Workforce mobilisation across multiple client sites
- Engagement with workers from a range of backgrounds, including potentially vulnerable groups
- We operate within these sectors because we provide a workforce tailored to specific client needs.
- Labour brokerage roles
- Shift-based and flexible working environments
- Use of agency and third-party hiring intermediaries



### **3. GOVERNANCE AND ACCOUNTABILITY**

Responsibility for modern slavery prevention sits at the highest level of the organisation.

- The Board of Directors retains ultimate accountability.
- The Operations Director has executive responsibility for implementation.
- A cross-functional compliance committee reviews and manages ongoing risks.
- A central compliance team conducts due diligence, audits, and escalates where necessary.
- Modern slavery risk is treated as a standing agenda item within the executive and operational reviews.

### **4. INDUSTRY-LEADING PREVENTION FRAMEWORK**

Icon People Recruitment Limited operates a layered prevention and control framework designed to eliminate risk at every stage of the recruitment lifecycle.

#### **VERIFICATION & ONBOARDING CONTROLS**

- 100% verification of identity and right-to-work documentation
- Face-to-face or virtual review and verification processes
- Cross-checking of personal data to identify anomalies (shared addresses, bank details, contact information)
- No worker is placed without full compliance approval
- System-led risk flagging
- Use of referral sources to prevent unauthorized agents and deception reporting
- Data analytics to identify patterns of disguise or high-risk behaviours
- Ongoing monitoring throughout the worker lifecycle—not just at



## **CENTRALISED COMPLIANCE AND CANDIDATE ASSURANCE**

- Centralised compliance approval for all candidate registrations
- Document validation and audit trails maintained for all workers
- Regular review and strengthening of onboarding controls
- Our approach is deliberately proactive rather than reactive, focusing on early identification and prevention.

## **5. CLIENT AND SUPPLY CHAIN DUE DILIGENCE**

We recognise that risk extends into the environments where workers are deployed. To mitigate this, we:

- Conduct pre-engagement due diligence on all clients
- Include binding contractual clauses relating to modern slavery and worker welfare
- Maintain ongoing dialogue with clients regarding working conditions
- Undertake spot checks and site engagement activities where appropriate
- Where standards are not met, we take immediate and decisive action including escalation to relevant authorities if necessary.



## 6. POLICIES AND ETHICAL FRAMEWORK

Our zero-tolerance approach is underpinned by a suite of policies that are actively enforced across the organisation:

- Whistleblowing Policy
- Modern Slavery Policy
- Anti-Bribery and Corruption Policy

These policies are supported by clear reporting mechanisms and a culture of accountability.

## 7. TRAINING AND COMPETENCY

Icon People Recruitment Limited ensures that all relevant employees are trained to a high standard of awareness and competence.

Training includes:

- Identification of modern slavery indicators
- Sector-specific risks within Industrial and Driving environments
- Reporting and escalation procedures

Training is:

- Mandatory at onboarding
- Refreshed periodically
- Enhanced for high-risk roles (e.g. compliance)

onboarding

- Compliance oversight at every stage



## 8. REPORTING AND ESCALATION

We actively promote a speak-up culture. All employees, workers, and stakeholders are:

- Encouraged to report concerns without fear of retaliation
- Provided with clear escalation routes, including direct access to senior management

All reports are:

- Treated confidentially
- Investigated promptly
- Escalated to external authorities where appropriate



## 9. MONITORING, AUDIT AND MEASURABLE EFFECTIVENESS

Icon People Recruitment Limited measures the effectiveness of its modern slavery controls through defined compliance activities and performance indicators, including:

- 100% of workers subject to compliance verification prior to placement
- Regular internal audits and re-audits of compliance processes
- Spot checks across active assignments
- Monitoring of system alerts and exception reports
- Investigation of all reported concerns

These measures ensure that our approach is evidence-based, transparent, and continuously improving.



## 10. CONTINUOUS IMPROVEMENT AND SECTOR LEADERSHIP

Icon People Recruitment Limited is committed to maintaining its position at the forefront of ethical recruitment practices.

Over the next 12 months, we will:

- Expand client engagement and site oversight activity
- Strengthen supply chain due diligence processes
- Continue to align with emerging best practice and client expectations

Our objective is not only to protect workers within our own operations, but to raise standards across the Industrial and Driving recruitment sectors as a whole.



## 11. BOARD APPROVAL

This statement has been approved by the Board of Directors and will be reviewed annually to ensure ongoing effectiveness.

Approved by: Board of Directors

Date: **09 June 2026**

Signed: Manpreet Singh

**Manpreet Singh**

Director

Icon People Recruitment Limited