

MODERN SLAVERY STATEMENT

1. Introduction

725 Limited is a recruitment agency supplying temporary and permanent workers to businesses operating in the food production, packing, office, warehousing and related sectors. Our core business activities fall within the scope of the applicable gangmaster licencing requirements administered by the Fair Work Agency (FWA). 725 Limited holds the appropriate licence required for its business activities.

All recruitment and payroll activities are managed in-house by 725 Limited. We do not use third-party recruitment agencies, labour providers or recruitment intermediaries to source or recruit workers, or to process payroll for workers supplied directly to our client organisations and end-user businesses.

Our principle business relationships relevant to modern slavery risks are:

- Candidates and workers recruited directly by 725 Limited
- Client organisations and end-user businesses where workers are placed.

We recognise that modern slavery risks can arise at any stage of the recruitment and employment process, particularly where workers may be vulnerable or where there is limited visibility of working conditions at client and end-user sites.

725 Ltd operate a zero-tolerance approach to modern slavery and human trafficking.

We are committed to preventing modern slavery, human trafficking, forced labour, servitude and all forms of labour exploitation within our business and supply operations.

Although recruitment is managed in-house, as a recruitment agency operating within the UK employment regulatory environment, including the Fair Work Agency framework, we recognise our responsibility to promote ethical recruitment practices, protect workers' rights and ensure that individuals seeking employment are treated fairly, respectfully and lawfully.

This statement sets out the steps we have taken, and any further actions planned by 725 Limited to address modern slavery risks during the relevant reporting period.

2. Our Commitment and Policies

We are committed to ensuring that our business relationships reflect our expectations of ethical conduct and respect for human rights.

We are committed to preventing modern slavery and human trafficking in our own operation and, so far as reasonably practicable, throughout our supply to clients.

Our approach is guided by the principles of transparency, accountability, fair treatment and respect for workers' rights and in line with the Modern Slavery Act 2015.

We aim to ensure that:

- All recruitment activities are conducted ethically and transparently.
- Workers are not subjected to forced labour, coercion, threats or exploitation.
- Workers are provided with clear information about their roles, pay, working conditions and employment arrangements.
- No worker is required to surrender identity documents as a condition of employment or to secure work.
- Recruitment practices do not involve unlawful or exploitative fees charged to workers.
- Concerns relating to modern slavery are taken seriously and escalated appropriately.
- Employees understand their responsibilities in identifying and preventing exploitation, and we work with our clients to promote ethical recruitment and fair treatment of workers.

This statement should be read alongside our relevant policies and procedures, which may include our recruitment & induction policy, ethical trading policy, recruitment fees & remediation policy, whistleblowing policy and equality and diversity policy.

3. Risk Assessment

We recognise that recruitment businesses may be exposed to modern slavery risks through direct recruitment activities and relationships with Client end users.

The risks relevant to our operations may include:

- **Deceptive recruitment:** Candidates being misled about the nature of a role, pay, deductions, working conditions or accommodation.
- **Recruitment fees and debt bondage:** Workers being charged inappropriate fees by third parties in connection with obtaining employment, or becoming indebted through exploitative arrangements.
- **Withholding of documents:** Workers having passports, identification documents or other personal belongings retained against their wishes.
- **Wage exploitation:** Unlawful deductions, non-payment of wages, underpayment or restrictions on workers accessing their earnings.
- **Coercion and restriction of movement:** Workers being threatened, intimidated or prevented from leaving employment.
- **Exploitation of vulnerable workers:** Individuals experiencing language barriers, financial hardship, insecure immigration status or limited knowledge of their employment rights.

We will assess risks proportionately, taking account of the types of roles we recruit for, the locations in which workers are engaged, and any concerns identified through our recruitment and management activities.

4. Due Diligence and Preventative Measures

We are committed to implementing proportionate due diligence measures to reduce the risk of modern slavery within our business and in the supply of workers to our clients.

Our approach includes the measures currently in place. These measures focus on ethical recruitment, worker welfare, appropriate checks on clients and relevant business partners, and the investigation and escalation of concerns.

Ethical recruitment

We will seek to ensure that recruitment processes are transparent, that candidates receive accurate information about employment opportunities and that recruitment decisions are made without coercion or deception.

We will not knowingly participate in recruitment arrangements that involve forced labour, human trafficking or other forms of exploitation.

Candidate verification and worker welfare

We will carry out appropriate identity and right-to-work checks in accordance with applicable legal requirements and relevant guidance.

Where appropriate to our role in the recruitment and placement process, we will seek to ensure that workers understand their employment arrangements, pay, deductions and working conditions.

Client and supplier checks

We will undertake proportionate checks on clients, and any other relevant business partners, taking account of the risks associated with the services they provide.

Where appropriate, these checks may include reviewing relevant policies, licences, registration details, compliance records and published modern slavery statements.

We will seek assurances that relevant parties operate in accordance with applicable employment legislation and ethical recruitment standards.

Contracts and business relationships

Where appropriate, we will include contractual provisions requiring clients and suppliers to comply with applicable laws relating to modern slavery and human trafficking.

We reserve the right to review, suspend or terminate business relationships where credible concerns arise and cannot be satisfactorily addressed, subject to applicable contractual and legal obligations.

Worker-paid recruitment fees and identity documents

We will not knowingly engage in practices that cause workers to incur unlawful or exploitative recruitment fees.

We will not require workers to surrender passports, identity documents or other personal belongings as a condition of obtaining or retaining work.

Where concerns arise regarding fees, deductions or the retention of documents, we will seek to investigate and escalate the matter appropriately.

5. Reporting Concerns and Responding to Incidents

Concerns may be raised with either of the following contacts:

Head of Operations

Email: sarah@725ltd.co.uk

Telephone: 07944 513039

Director

Email: bashir@725ltd.co.uk

Telephone: 07888 882322

Concerns may also be reported through our applicable whistleblowing or complaints procedures. All concerns will be treated seriously and handled sensitively, with appropriate regard for confidentiality and the safety and welfare of potentially affected individuals.

Where a concern is identified, we will seek to:

- Assess the immediate safety and welfare of any potentially affected worker.
- Escalate the concern to an appropriate senior manager or designated contact.
- Investigate the matter proportionately and preserve relevant information.
- Engage with relevant clients, suppliers or authorities where appropriate.
- Take suitable action to prevent further exploitation and address identified failings.
- Review existing controls and implement improvements where necessary.

We will not knowingly ignore credible allegations of exploitation. Where there is an immediate danger to life or safety, emergency services should be contacted.

6. Training and Awareness

We recognise that staff involved in recruitment, candidate screening, worker placement and supplier management can play an important role in identifying potential indicators of modern slavery.

We will seek to ensure that relevant staff understand the nature of modern slavery, recognise potential warning signs and know how to report concerns.

Training and awareness activities may cover:

- Indicators of forced labour, human trafficking and labour exploitation.
- Ethical recruitment and fair treatment of candidates.
- Recruitment fees, wage deductions and document retention.
- Identifying and escalating concerns involving vulnerable workers.
- Responsibilities when dealing with clients, suppliers and any applicable parties.

We will review training needs periodically and provide additional guidance where appropriate.

7. Monitoring and Measuring Effectiveness

We recognise that tackling modern slavery requires ongoing monitoring and continuous improvement.

We will review the effectiveness of our approach using proportionate measures, which may include:

- Completion of relevant staff training.
- The proportion of relevant clients and suppliers subject to due diligence checks.
- The number and nature of concerns raised and how they are addressed.
- Reviews of recruitment practices, worker feedback and complaints.
- Actions taken to address identified risks or weaknesses.
- Periodic reviews of relevant policies, procedures and contractual arrangements.

We will use the findings of these reviews to identify areas for improvement and strengthen our controls where necessary.

Where concerns or incidents are identified, we will consider the lessons learned and the steps required to reduce the likelihood of recurrence.

8. Governance and Responsibility

Overall responsibility for this statement and our approach to modern slavery rests with the senior management of 725 Limited.

Day-to-day responsibility for implementing relevant procedures rests with Senior Management, supported by employees involved in recruitment, compliance, operations and supplier management. All employees are expected to act ethically, comply with applicable policies and report concerns promptly.

Senior management will review this statement annually and consider whether additional measures are required to reflect changes in our business, recruitment activities, supply chains or applicable legal requirements.

9. Approval and Publication

This statement will be reviewed and updated annually and has been prepared with reference to section 54 of the Modern Slavery Act 2015 and relevant UK Government guidance.

It has been approved by Senior Management of 725 Limited:

Signed:

Name: Bashir Ali

Position: Director



Signed:

Name: Sarah Paradine

Position: Head Of Operations



For and on behalf of: 725 Limited

Date: September 2026

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