

MODERN SLAVERY ACT STATEMENT

INTRODUCTION

This statement is made on behalf of STR Limited (STR). Any references to ‘we’ ‘us’ or ‘ours’ shall be interpreted as references to STR, as the context so requires.

This is our annual statement of slavery and human trafficking, made in compliance with Section 54 of the Modern Slavery Act 2015 (the “Act”), in which we explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it. We are committed to improving our practices to combat slavery and human trafficking.

ORGANISATION’S STRUCTURE

We are a part of the STR Group and our ultimate parent company is STEM Talent Recruitment Limited. STEM Talent Recruitment Limited’s office is in England, and is an international recruitment business, operating from four offices across the United Kingdom, the United States and Switzerland. The Group has over 120 employees worldwide.

We supply candidates to clients based in many different countries across the world, and we operate under six successful complimentary brands with expertise in recruitment and related services in the following sectors: Automation, Built Environment, Engineering & Manufacturing, Life Sciences, Maritime, Architecture and Professional Services. We share the same values across all our brands.

Our supply chain is comprised of suppliers who provide goods and services to us, and includes umbrella companies, other recruitment agencies and workers who provide services via limited companies and Statement of Work solutions.

The Group has a global annual turnover of approximately £45m.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We aim to exercise the highest ethical and professional standards and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects this commitment to acting ethically and with integrity in all our business relationships. We implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. This policy is available to, accessible by and applicable to all our employees, officers and directors. All amendments are immediately drawn to their attention and they are required to acknowledge that they have read, understood and agree to all obligations.

Our employees are directed to immediately report any information from any source that alleges a violation of our Modern Slavery Policy. We also operate a Whistleblowing Policy so that all employees know they can raise concerns regarding how colleagues or candidates are being treated, or practices within our business or supply chain, without fear of reprisals.

OUR APPROACH

To date we have taken the following approach to eradicating human trafficking from within our business:

- We continue to raise awareness of our Modern Slavery Policy to all employees within our business to reinforce the importance we place on compliance with its principles;
- The Group’s terms and conditions are maintained and regularly reviewed by the Group’s in-house Legal & Compliance Team. We can confidently assert that they are fit for purpose and robust, and have ensured that where possible our counterparts are either specifically required to comply with the Act, or that there is a clause requiring them to comply with all applicable laws (including the Act by implication);
- We have a growing and skilled onboarding team who maintain a rigorous onboarding process of all contractors both at home and abroad. They ensure all checks including ‘Right to Work’ are completed and where this takes place face to face, they ensure that all relevant documents are returned immediately to employees/workers during their registration process;
- We have checks in place to ensure compliance with the National Minimum Wage and ensure all contractors are paid directly into their personal bank accounts or the company bank account of which

- they have evidenced they are a director, to ensure full transparency in our supply chain;
- We maintain oversight of our compliance through our Legal & Compliance team to whom all employees can address issues of concern;
- We have a robust onboarding process for all suppliers to STR, ensuring they undergo a process of in-depth due diligence and sign off at senior management level before engaging them as part of the Group’s supply chain;
- We provide regular responses to clients with whom we work, regarding approaches in working practices to ensure ethical working;
- We continually monitor our business processes to ensure they are robust, relevant and fit for purpose;
- In 2023 we did not receive any reports of incidents or allegations of slavery or human trafficking within our business or supply chains.
- We maintain a Whistleblowing Policy and procedures to support staff and contractors who raise any concerns;
- We regularly engage with other organisations and professional bodies to learn and share best practice, including membership of the Recruitment & Employment Confederation (REC); and
- We maintain an accreditation to the Maritime Labour Convention (MLC) to evidence our commitment to those we engage with in these sectors, to their well-being and safety;

FURTHER STEPS

In 2024 we continue to focus on the following areas to combat slavery and human trafficking in our business by:

- Continuing to identify, understand and map the Group’s supply chains and focus on areas where there is a potentially higher risk of modern slavery;
- Maintaining and continually enhancing our internal onboarding training to ensure that understanding surrounding modern slavery remains fresh (including the warning signs that slavery may be taking place) and relevant, particularly in industry sectors deemed to be higher risk insofar as the Act is concerned;
- Mitigating our risk of exposure by not engaging in areas of business renowned for poor practice;
- Mitigating such risks through the regular review of our on-boarding processes and practice to ensure that our procedures regarding identity and compliance checks are as robust as possible;
- Gaining clear confirmation from small companies without a Modern Slavery statement, of their commitment to these standards to ensure transparency at all times;
- Working closely with all brands to ensure best practice is shared and implemented across the Group as a whole;
- Signing up to the Government Modern Slavery Statement registry and submitting the annual statement for 2024.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2024.

Signed 

Name Darren Day

Position Chief Executive Officer

Date 2nd September 2024