



Modern Slavery Policy – 2024

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Who to contact?

Should you have any queries regarding this policy or wish to report any situations, please contact HR:

- Rhianna Webster – HR Advisor – rhianna.webster@magnussearch.com



1. Introduction

We take all forms of malpractice very seriously, whether it is committed by us, suppliers, agents or any other type of partner.

This Policy covers all operations and activities carried out by, or on behalf of, Magnus Search and its subsidiaries, anywhere in the world. It applies to Modern Slavery.

Our culture is to be open, honest and straightforward with our customers, suppliers, partners and each other. We do not tolerate any form of Modern Slavery, not only because it is a criminal offence but also because it is unethical and dishonest. We have set out in this Policy the minimum standards acceptable to the Group.

We ask that you take time to read and understand this Policy, which outlines what is expected of you, and that you take the necessary steps to:

1. Ensure that workers are not being exploited, that they are safe and that relevant employment laws (including in relation to wages and working time), health and safety laws, human rights laws and international standards are adhered to, including freedom of movement and communications.
2. Operate with honesty and integrity.
3. Remember that Modern Slavery is a criminal offence.
4. Act when you encounter activity that you consider may constitute a breach of this Policy.
5. Avoid putting Magnus Search in a compromising position.
6. Seek line manager advice if you are concerned that an instance of Modern Slavery might have occurred.
7. Report breaches of this Policy, which can be done in confidence, to our Whistleblowing Line or by contacting HR who will escalate the situation appropriately.



2. What is Modern Slavery?

Modern Slavery is a term that encompasses both offences in the Modern Slavery Act: slavery, servitude, and forced or compulsory labour; and human trafficking.

It takes on many forms today and some of the key examples are as follows:

- Human Trafficking – Described by the United Nations as the recruitment, transportation, transfer, harbouring, or receipt of persons by improper means (such as force, abduction, fraud, or coercion) for an improper purpose, including forced labour or sexual exploitation.
- Bonded Labour – Also known as debt bondage and peonage, where a person is forced to work to pay off a debt.
- Child Slavery – Any work deemed to be harmful to the health, safety or morals of a child (under 18) is considered to be child labour.
- Forced Marriage – Where individuals don't have the option to refuse or are promised and married to another by their parents, guardians, relatives or other people and groups.
- Domestic Servitude – Often a form of Bonded Labour, it covers the exploitation and control of someone providing live-in help (maids, servants, housekeepers, child-carers and those caring for the elderly are examples).
- Forced Labour – Where victims are made to work through violence and intimidation.

3. Who does this policy apply to?

We all have a responsibility to act with honesty and integrity and the Policy is relevant everyone including:

- Employees – all Magnus Search colleagues (permanent or temporary).
- Supplier and partners – our suppliers, business customers, landlords, contractors and sub-contractors, outsource partners and shop-in-shops, joint ventures, consultants and franchisees.
- Agents – an 'agent' of Magnus Search is a third party engaged to act as an intermediary between Magnus Search and another company / organisation.



4. What is expected of Magnus Search colleagues, suppliers and partners?

Magnus Search colleagues are required to comply with this Policy at all times. Failure to do so may constitute a criminal offence and will be considered to be gross misconduct, leading to disciplinary action up to and including summary dismissal.

We also expect all of our suppliers and partners to operate in a manner which does not conflict with this Policy and to respond to all reasonable requests for information that will allow Magnus Search to fulfil its own obligations.

If suppliers or partners fail to comply with this Policy, it is likely to preclude them from maintaining their relationship with Magnus Search and potential breaches may be reported to the relevant civil and criminal authorities.

We expect all of our suppliers and partners to implement and maintain their own procedures designed to ensure their businesses and supply chains are free of Modern Slavery.

5. What should I do if I discover or suspect a case of Modern Slavery?

All breaches of this Policy must be reported to your manager or HR and/or to the Expolink Integrity Line shown in Appendix A.

You can phone or use the online tool in confidence (and anonymously, if you wish) knowing that you won't be traced or recorded. If you reveal your identity to Expolink, they will do everything possible to keep it secret, if you want them to.

You don't have to fear that you will be harassed or bullied, lose out on opportunities or training, or face demotion or dismissal, as a consequence of raising your concerns.

In certain circumstances, for example, if your concern becomes the subject of a criminal investigation, you may be needed as a witness. This will be discussed with you at the earliest opportunity.



6. How should our suppliers deal with discovered or suspected Modern Slavery?

In Magnus Search we take ethical behaviour and legal compliance very seriously. If suppliers or partners suspect there has been an instance of Modern Slavery within Magnus Search or in another Magnus Search supplier or partner, those suspicions should be reported to HR who will escalate the report appropriately.

We expect suppliers and partners to notify us immediately of their concerns; they must not wait until after internal investigations have been concluded.

7. Supporting and Related Documents

The documents listed below should be read in conjunction with this Policy:

- Whistleblowing Policy
- Ethical Conduct Policy
- Disciplinary Policy

If you require further information and assistance in relation to compliance with this Policy, you should speak with HR.

8. Document Control

Issued By	Group Compliance
Effective Date	03/01/2024
Applicable to	All colleagues of Magnus Search globally.
Version	V 5.0

[Appendix A: Integrity Line \(Expolink contact details\)](#)

For any country not shown, it is possible to make a Collect (or 'reverse charge') call using the following steps:

1. Caller dials their country operator.

- Magnus Search +44 (0) 1622391150