

Code of Practice

In undertaking recruitment activity, Stawi Limited affirms, adheres to and is committed to the code of practice for the international recruitment of health and social care personnel, the most recent of which was published on 25th February 2021:

<https://www.gov.uk/government/publications/code-of-practice-for-the-international-recruitment-of-health-and-social-care-personnel/code-of-practice-for-the-international-recruitment-of-health-and-social-care-personnel-in-england>

Modern Slavery Act Statement

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Stawi Limited, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

Our business and supply chains

- Stawi Limited, UK incorporated with business license 07642855
- Business activities: Other activities of employment placement agencies; and other letting and operating of own or leased real estate

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law and references.

Risk assessment

We conducted a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

Policies

Stawi Limited operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Code of conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour.
- Our supplier contracts make explicit reference to slavery and human trafficking.

Supplier due diligence

Stawi Limited conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

Awareness

Stawi Limited has raised awareness of modern slavery issues within the company by disseminating internal messages focused specifically on modern slavery to all staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery
- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps Stawi Limited will take if a supplier fails to implement anti-slavery policies or controls

Employees attest that they will abide by Stawi Limited's anti-slavery policy.

Measuring how we're performing

Stawi Limited has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain.