

## MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT 17/18

### Introduction

Orca Pay Group recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Orca Pay Group operates a zero-tolerance approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains and business practices are free from slavery and human trafficking. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Organisational structure and supply chains

This statement covers the activities of Orca Pay Group Limited.

- Orca Pay Group is referred to commonly in the industry as an 'Umbrella' company. We employ large numbers of workers under an overarching contract of employment to work on temporary assignments for end clients/users. The assignments are usually sourced by recruitment businesses. Orca Pay Group is responsible for the employment and payroll of these workers.

The supply chain usually runs as follows:

- The client contacts a recruitment business to source a worker to assist with its work load. A contract for services is normally signed between the two businesses.
- The recruitment business recommends that the worker is employed by Orca Pay Group, alternatively, the worker advises the recruitment business that it wishes to be employed by Orca Pay Group.
- Orca Pay Group and the recruitment business agree and sign a contract for services.
- Orca Pay Group employs the worker under a contract for employment which supports efforts that there is no forced labour. Right to Work Checks etc

### Countries of operation and supply

Orca Pay Group currently operates exclusively in the UK. Orca Pay Group's head office is based in Hertfordshire and our workers are placed all over the country.

### Responsibility

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (but not limited to):

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the National Minimum Wage and have the Right to Work in the UK;
- We encourage the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values. To ensure an elevated level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

### Due diligence processes

We take the following steps to prevent slavery and human trafficking in our business and supply chain:

- We will not support or deal with any businesses knowingly involved in slavery or human trafficking. The agencies we use for the supply of labour are reputable agencies and we expect them to follow the same antislavery policies as we do. We follow a strict agency/client on-boarding process as follows:
  - Completion of our New Agency/Client Supply of Services contract.
  - Check on the Company and VAT numbers.
  - Credit check.
  - Ensure that the company accounts have been filed.
  - Incorporation check.
- We adhere to the National Minimum Wage (NMW) or National Living Wage (NLW) as appropriate. Our systems restrict us from processing a payment below the NMW/NLW and our employment contract with the worker also reiterates this point.
- We want to encourage our employees to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure has been designed to make it easy for workers to



make disclosures, without fear of retaliation. Employees, customers or others who have concerns should be able to contact the Company on a confidential basis.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015

For transparency the company will have a link to the Modern Day Slavery & Trafficking Act 2015 on its website for the public, clients, employees or investors to view.

This policy applies to all those employed by Orca Pay Group Ltd

Date: 9<sup>th</sup> May 2018

A handwritten signature in black ink, consisting of a large circle and several overlapping lines, is written over a horizontal blue line.

Signed

[Owen Mitchell \(May 9, 2018\)](#)

Director  
Orca Pay Group Ltd