

MODERN SLAVERY STATEMENT

1. Optime Group Limited is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Optime Group Limited is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Optime Group Limited provides appropriate training and awareness information for all of its staff. In particular:
 - Our HR personnel undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
 - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to our HR Manager, Tatiana Goncalves.
5. Reports surrounding these issues are taken extremely seriously by our board of directors who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - Working with the appropriate organisations to improve standards,
 - Removing that organisation from our preferred supplier list,
 - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
 - The percentage of clients who sign up to an appropriate code / provide their own modern slavery statements,
 - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
 - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
8. We would also recommend reading this in conjunction with our other policies, including our:
 - Ethical procurement policy,
 - Anti-bribery / corruption policy, and
 - Whistle-blowing policy.

This policy was adopted on 6th April 2019 after being agreed by the board of directors. It is reviewed annually.

This statement is made as part of Optime Group Limited's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Optime Group Limited operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act and relates to the financial year April 2019 to March 2020. It was approved by the board of directors on 6th April 2019.

Matthew Young

Director

1 Our Business

Optime Group Limited is a limited company operating in the recruitment sector. We supply temporary workers in the Aviation, Industrial, Hospitality and Retail sectors.

Optime Group Limited is an independent business.

1.1 Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of our work-seekers are supplied via other businesses, who facilitate providing them to the eventual hiring company.

The hiring companies that we work with are located in Gatwick, Heathrow, Birmingham, Manchester and Luton. The workers we supply live in the surrounding areas to our respective hiring companies.

1.2 Other relationships

As part of our business, we also work with the following organisations:

- the Gangmasters & Labour Abuse Authority (www.gla.gov.uk)
- the Association of Labour Providers (www.labourproviders.org.uk)
- the Recruitment and Employment Confederation (www.rec.uk.com)

2 Our Policies

Optime Group Limited has a modern slavery policy available at www.optimegroup.co.uk/about.html

2.1 Policy development and review

Optime Group Limited's policies are established by our directors based on advice from HR professionals, industry best practice and legal advice. We review our policies annually or as needed to adapt to changes.

3 Our Processes for Managing Risk

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- We review the potential for risk at regular intervals, including the possibility of auditing a supplier or conducting spot checks.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We require the businesses we work with to publish a modern slavery statement.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.

Our staff are encouraged to bring any concerns they have to the attention of management.

4 Our Performance

As part of monitoring the performance of Optime Group Limited, we track the following general key performance indicators:

- The level of training amongst our staff
- The speed with which we investigate related complaints, and the effectiveness of any whistle-blowing procedures

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our board of directors:

- the percentage of suppliers who provide their own modern slavery statements
- the effectiveness of enforcement against suppliers who breach policies
- the level of modern slavery training and awareness amongst our staff

We carefully consider our indicators in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

5 Our Training

All of our staff receive training and support that is appropriate to their role. In particular:

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our HR personnel undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have. Training is refreshed annually.