



TOMORROW'S TALENT, TODAY

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INTRODUCTION – Modern Slavery Statement

This statement applies to D4 Digital Limited (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2024.

ORGANISATIONAL STRUCTURE

The Head Office plays the part of central operations for D4 Digital Limited, within the company there are many different divisions. The organisation is controlled by directors who make the day to day management decisions. The main activities carried out by the organisation is the temporary and permanent recruitment support for many different sectors including healthcare and education.

The labour supplied to the *organisation* in pursuance of its operation is carried out in the United Kingdom including but not limited to Greater Manchester, Lancashire, Cheshire and Staffordshire.

DEFINITIONS

The *organisation* considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

The *organisation* acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The *organisation* understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The *organisation* does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the *organisation* in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The *organisation* strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, *and in many cases exceeds those minimums in relation to its employees.*

SUPPLY CHAINS

In order to fulfil its activities, the *organisation* works with local authorities, private clients, contracts/tenders and neutral vendors/DPS. All due diligence are complete before agreements or contracts are started.

POTENTIAL EXPOSURE

The *organisation* considers its main exposure to the risk of slavery and human trafficking to exist within its private clients due to reduced internal vetting within organisations. In general, the *organisation* considers its exposure to slavery/human trafficking to be *relatively limited. Nonetheless*, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the *organisation*, as it did for others across the nation.

The *organisation* welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty. The *organisation* concludes that the COVID-19 pandemic *did* adjust the risk of modern slavery to a level above that which existed before the pandemic. This was due to increase pressures within organisations. During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had. In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The *organisation's* modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

STEPS

The *organisation* carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The *organisation* has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the *organisation* has taken the following steps to ensure that modern slavery is not taking place:

- *reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;*
- *undertaking impact assessments of its services upon potential instances of slavery;*
- *creating action plans to address risk to modern slavery;*
- *Zero tolerance policy towards modern slavery;*

TRAINING

The *organisation* provides training to staff to effectively implement its stance on modern slavery.

SLAVERY COMPLIANCE OFFICER

The *organisation* has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the *organisation* obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.



Chris Hunter – Managing Director