BerkeleyScott
HOSPITALITY, CATERING AND SUPPORT SERVICES RECRUITMENT

kellan

| Issue Number | 01 |
|---|---|
| Issue Date | 24/11/2026 |

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

| | |
|---|---|
| **Statement period** | Nov 2026 – Nov 2027 |
| **Approval date** | 24/11/2026 |
| **Next review date** | 23/11/2026 |

## Introduction

Berkeley Scott is committed to acting ethically and with integrity in all our business dealings and relationships. We oppose all forms of modern slavery, human trafficking, forced or compulsory labour and worker exploitation, whether within our own operations, our direct suppliers or the wider supply chains connected with our business.

This statement explains how Berkeley Scott applies the principles and requirements set out in Kellan Group Ltd's overarching Modern Slavery and Human Trafficking Policy within its own recruitment activities and supply chains. It should be read alongside that group policy and the relevant Kellan Group policies referred to in this statement.

Berkeley Scott is issuing this standalone statement voluntarily as a matter of good practice. It is not intended to represent a separate statutory statement under section 54 of the Modern Slavery Act 2015. The Kellan Group policy and any group-level statutory reporting position remain distinct.

## 1. Our business

Berkeley Scott is a specialist recruitment business providing temporary and permanent recruitment solutions across the hospitality, catering and support services sectors.

We supply temporary workers across a range of roles, including chefs, kitchen assistants, catering assistants, front-of-house staff, hospitality personnel and other support services workers. We also recruit and source permanent candidates for clients operating within the same markets.

Our consultants work with clients across hospitality, catering, leisure, education and wider service industries. Our recruitment activities place us in a position of responsibility to ensure that candidates and workers are treated fairly, understand their working arrangements and are not exposed to exploitative practices.

## 2. Our supply chains

Our supply chain includes two principal areas:

### Agency and labour supply chain

Through our Managed Service Provider (MSP) contracts, Berkeley Scott works with approved second-tier recruitment agencies to provide additional temporary staffing capacity where required. We recognise that the use of third-party labour providers creates additional responsibilities and potential risks in relation to worker welfare, recruitment practices and exploitation.

We require second-tier agencies to meet the same standards of ethical recruitment, worker protection and compliance that we expect within our own business. These agencies are subject to supplier due diligence, approval and ongoing monitoring, including audits of relevant documentation and compliance arrangements.

### General business supply chain

Outside our recruitment and labour supply arrangements, Berkeley Scott's supply chain is relatively limited and consists mainly of routine business suppliers, including stationery, office-related products and services and other general business support. In line with the Kellan Group approach, we seek to build appropriate, long-standing relationships with local suppliers and make our expectations of ethical business conduct clear.

We recognise the wider group expectation to source principally from suppliers based in the UK and EU where appropriate. Where national or international supply chains are involved, we prefer to deal with a UK company or branch and expect those businesses to have suitable policies and processes to address modern slavery and human trafficking.

## 3. Our commitment and relevant policies

Berkeley Scott adopts Kellan Group's zero-tolerance approach to modern slavery and human trafficking. We expect employees, suppliers, contractors, second-tier agencies and clients to act consistently with this commitment and with our values.

We are committed to paying workers at least the applicable National Minimum Wage or National Living Wage, as appropriate, and to ensuring that pay arrangements are transparent and lawful. We do not charge candidates or temporary workers fees for finding work or securing employment opportunities.

Our approach is supported by the relevant Kellan Group policies, which should be read alongside this statement. These include:

- Health & Safety Policy
- Environmental Policy
- Quality Management System Policy
- Data Protection Policy
- Equality, Diversity and Inclusion Policy
- Anti-Bribery Policy
- Modern Slavery Human Trafficking Policy
- Whistle Blowing Policy
- Sustainability Policy
- Bullying, Harassment & Victimisation Policy
- Corporate Social Responsibility Policy
- Complaints Procedure
- A.I. Policy
- Menopause Policy

These policies support fair treatment, appropriate conduct, reporting of concerns and the protection of individuals who raise concerns in good faith. The relevant policies are overseen through the Kellan Group governance arrangements, with Berkeley Scott's Managing Director responsible for ensuring that the principles are reflected in the business.

## 4. Due diligence and operational controls

We operate candidate registration, screening and compliance procedures designed to reduce the risk of exploitation and protect workers. These include:

- Verifying candidate identity and right to work in the UK before deployment, in accordance with applicable legislative requirements.
- Screening and interviewing candidates to understand their suitability and identify potential welfare concerns.
- Checking relevant employment history, references, qualifications and role-specific training where appropriate.
- Providing clear information about pay rates, working arrangements, assignment details and applicable terms.
- Monitoring working hours, attendance and timesheets to support accurate and timely payment.

- Maintaining communication with temporary workers so that concerns about treatment, working conditions or welfare can be raised.

We expect our clients to have appropriate policies and procedures to prevent modern slavery and human trafficking, to provide safe working environments and to treat workers fairly. Where possible, we seek to visit the sites at which our temporary workers are based at least once each year. Site visits and ongoing client contact provide opportunities to review working arrangements and identify concerns.

**Second-tier agency checks**

Before approval, second-tier agencies are required to provide relevant business information and evidence of their employment, recruitment and candidate compliance arrangements. This may include company details, insurance information, relevant policies and sample worker compliance records.

Ongoing monitoring and audits are undertaken by the relevant MSP and Compliance teams to check that agency partners continue to meet Berkeley Scott's standards. Where concerns or shortcomings are identified, further evidence, corrective action or a review of the supplier relationship may be required. We will not knowingly engage or continue to work with an organisation involved in modern slavery, human trafficking or worker exploitation.

## 5. Assessing and managing risk

We recognise that risks may arise in recruitment and hospitality, particularly where workers are recruited at short notice, sourced through multiple agencies or placed in high-volume operational environments. Potential indicators include misleading job offers, recruitment fees, withholding of identity documents, unlawful deductions, underpayment, excessive hours, threats, coercion or restrictions on a worker's freedom to leave employment.

We also recognise that workers may be more vulnerable where they face language barriers, financial pressures or are unfamiliar with UK employment rights. Our candidate screening, identity and right-to-work checks, clear communication about pay and assignments, worker contact, client engagement and supplier audits are intended to reduce these risks.

Employees are expected to remain alert to signs of exploitation and to escalate concerns promptly. Concerns will be assessed and investigated, with appropriate action taken. This may include protecting the worker, suspending a placement or supplier relationship and referring the matter to relevant authorities or specialist organisations where appropriate.

## 6. Reporting concerns and whistleblowing

We encourage employees, candidates, temporary workers, suppliers and other stakeholders to raise concerns if they suspect modern slavery, human trafficking or any form of worker exploitation.

Concerns may be raised through the reporting routes set out in the Kellan Group Whistleblowing arrangements and relevant internal management or compliance channels. Reports will be treated seriously and handled appropriately. We support the protection of individuals who raise genuine concerns in good faith and do not tolerate retaliation against anyone for doing so.

Where an individual is in immediate danger, the appropriate emergency services should be contacted. Suspected criminal activity may also be referred to the relevant authorities.

## 7. Training and awareness

Kellan Group provides training to relevant members of staff to promote understanding of modern slavery and human trafficking risks within the business and supply chains. All Directors have been briefed on the subject.

Within Berkeley Scott, we expect managers and relevant employees, particularly those involved in candidate registration, temporary worker management, client relationships, MSP operations and supplier approval, to understand the indicators

of exploitation and how to report concerns. Training and awareness are supported by the Kellan Group Training Policy and relevant compliance communications.

## 8. Monitoring, effectiveness and review

We monitor the effectiveness of our approach through candidate compliance checks, internal audits, supplier due diligence and audits, worker and client feedback, site visits where possible, and the review and investigation of concerns.

Our internal compliance audit programme includes weekly sampling of five candidate records per recruitment desk. This provides a regular view of compliance standards and helps identify gaps or trends requiring corrective action. Second-tier agencies used on MSP contracts are also subject to ongoing monitoring and quarterly audits against our required standards.

Findings are used to identify improvements, address non-compliance and inform management oversight. We will continue to review our controls to ensure they remain proportionate to the nature of our business and the risks identified.

This statement will be reviewed at least annually and updated where appropriate to reflect changes in our business, supply chains, policies or controls.

## Approval

This Berkeley Scott statement has been reviewed and approved by:

**Signed:** 

Pam Martin
Managing Director
Berkeley Scott

Date: 21/11/2026

Statement period: Nov 2026 – Nov 2027