

Orion Electrotech Ltd



Modern Slavery Statement – 5th April 2024

Modern Slavery Statement

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by Orion Electrotech Ltd (“we” or “our”) to prevent modern slavery and human trafficking in our business and supply chains during the financial year ending June 2024.

Orion Electrotech have a zero-tolerance approach to all forms of slavery and human trafficking and is committed to ensuring our practices combat slavery and human trafficking within our business and supply chain by taking all reasonable steps necessary. We recognise our collective responsibility to be alert to the risks within our business and our supply chain and is committed to developing and improving its processes to combat slavery and human trafficking.

This statement was approved by Grant Nesbitt, Group Managing Director – 7th April 2024



Our Business

Orion Electrotech Ltd is an Employment Agency and Business (whose parent company is Orion Managed Services – Ultimate parent company Technopro Holdings Ltd) with decades of expertise in recruiting for the Engineering, Manufacturing, Gas, and Construction industries. At Orion Electrotech, we prioritise building lasting relationships with both clients and candidates. Our deep industry knowledge and experience have enabled us to partner with a wide range of businesses, from dynamic start-ups to SMEs and leading blue-chip companies across the UK.

The company has 75 employees operating in the UK, with annual revenue of c.£40m. Our Core business offers permanent and temporary recruitment services across a wide range of disciplines. To find out more about the nature of our business, visit our website [Orion Electrotech Ltd](#).

Compliance is intrinsic in our business procedures and processes and as a business we will always ‘do the right thing’.

Our Supply Chain

As a provider of Recruitment Services, the nature of our business requires that we work in conjunction with a range of suppliers who provide goods and services, as well as those who are involved in the services we provide to our candidates and clients.

This includes, workers who provide services via a PSC (limited company), PAYE contractors, or umbrella companies which are higher risk suppliers.

We will annually review our key suppliers and will not work with any organisation that has been found to have knowingly been involved in modern slavery or human trafficking. Our onboarding and payroll processes include specific prohibitions against modern slavey or human trafficking.

Policies in Relation to Slavery and Human Trafficking

At Orion Electrotech Ltd, we have many policies, procedures and training that translate into our daily business.

The following policies exist within our organisation which demonstrate our opposition to modern slavery:

Corporate Social Responsibility, Modern Slavery and Ethics Policy, Code of Conduct, Ethical Procurement and Sustainability Policy, whistleblowing policy and Data Protection Policy.

Our Corporate Social Responsibility, Modern Slavery and Ethics Policy implements effective systems and controls to eliminate slavery and human trafficking from our business and supply chains. All employees are expected to comply with the policy, which includes raising any concerns and using the appropriate reporting channels at the earliest possible stage.

All policies are available to employees at all times via our internal intranet system. We have effective systems in place to investigate any concerns raised in line with our policies, and we continue to review the effectiveness of our internal controls in line with our compliance auditing procedures.

Due Diligence Processes

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, we adopt the following due diligence procedures: We have a Supplier Process that requires relevant documentation following supply. For suppliers we deem high-risk (such as those providing payroll services), we conduct thorough due diligence, following which each supplier must be approved prior to us engaging in any business with them. Upon approval suppliers receive our Ethical Procurement and Sustainability policy which they are expected to adhere to. This involves a commitment to always acting ethically and with integrity, ensuring effective controls are in place to prevent modern slavery or human trafficking from taking place both in their business and within their supply chains.

We operate an annual review process of relevant compliance documentation., which includes requesting an updated Modern Slavery statement from our suppliers, where applicable.

Our processes aim to:

- Identify, monitor and manage areas of potential risk in our business and supply chains.
- Scrutinise any identified areas of risk within our business and supply chains,
- Adopt a zero tolerance approach to slavery and human trafficking throughout the organisation and our supply chains.
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

Risk Assessment and Management

Our organisation regularly evaluates the nature and extent to which our business and our supply chains are exposed to the risk of modern slavery occurring.

The following list of risk management activities and/or procedures demonstrates our commitment to compliance:

- Identify and assess potential risk areas in our supply chains;
- Robust processes that effectively prevent and detect modern slavery concerns.
- Audit prospective suppliers based on their risk level;
- Carry out regular record analysis as standard for our colleagues;
- In higher-risk areas for candidates, identify red flags such as multiple workers having the same contact telephone numbers, address, bank details.
- Spot checks on pay slips or agency worker and umbrella company
- Ensure bank details match the name of the RTW check / business name (for PSC providers).
- Maintain contact with workers on a regular basis – welfare check.

We are members of the Railway Industry Supplier Qualification Scheme (RISQS) which verify we operate as an ethical business, to supply into a high-risk environment.

We do consider that we operate in high-risk sectors within Construction and Manufacturing. Where we have identified a potential risk (for example: multiple agency workers at the same address) we prioritise any risks and take appropriate action to put remedial measures in place. We run reports to spot duplicated addresses and complete checks on workers bank details (making sure bank accounts are in the workers name only) as well as Identification checks.

We ensure our suppliers are aware of our policies and encourage them to adopt our high standards. We adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation which extends to our supply chains. Upon discovery of a breach of our policies relating to slavery and human trafficking we will terminate any relationship with the relevant supplier with immediate effect.

Risk Assessment and Management

Key performance indicators to measure effectiveness of steps being taken

Below is a list of the performance indicators used to measure and understand our level of risk – these include but are not limited to:

- Risk and control effectiveness monitoring.
- Records of mandatory anti modern slavery training to ensure our employees are aware of the warning signs.
- Ongoing auditing of payroll management service providers.
- Due diligence screening of third parties.
- Maintaining RISQS membership, Constructionline, SIPP, as well as ISO 9001:2015

Training on Modern Slavery and Trafficking

Detailed below are examples of the training programmes we have in place to enable our employees to identify and report any potential breaches of the organisations anti-slavery and human trafficking policies.

We have increased internal awareness, identifying and responding to modern slavery and human trafficking incidents. These included updating our in-house guidance and providing details for the government's Modern Slavery Helpline. Key members of the Management team undertook training with Stronger Together, a not-for-profit organisation that helps businesses tackle workplace exploitation. We created bespoke in-house training and rolled it out to all employees, in conjunction with raising awareness of Anti-Slavery Day. To further enhance awareness and support we will be creating more Anti-Slavery Champions across our business, an activity we will further develop throughout 2025.

Employees will undertake training once every 2 years to keep knowledge and understanding up to date, and this starts within their first few weeks of employment with us.

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Continue to monitor, clarify and enhance our processes for engaging with clients, umbrellas, payroll management Companies and placing contractors in all industries, in order to protect workers.
- Continue to promote internal awareness - to include Modern Slavery Champions.
- Improve our internal Group modern slavery policy.
- Improve visibility and contractors' method to notify us of health & safety concerns.