

Modern Slavery Statement

Gravitas Recruitment Group Limited

16/10/2026
Financial year ended 30 November 2025

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Gravitas Recruitment Group Limited (06959984) during the financial year ended 30 November 2025 to prevent modern slavery and human trafficking within its business and within the supply chains through which it operates. This statement replaces the version first published on 17 March 2026.

Organisation Structure

Gravitas Recruitment Group is an international recruitment consultancy, founded in 2010, providing permanent and contract recruitment services in the specialist areas of technology, insurance and banking. Our technology work includes a public sector division serving organisations such as housing providers, the NHS and education bodies. The Group is headquartered in London and operates from offices in Leeds, Manchester, Frankfurt, Rotterdam, Hong Kong, Shenzhen and Singapore.

Our Supply Chains

Our supply chains fall into two categories:

- **Labour supply chain:** the permanent candidates and contractors we place with clients, and the umbrella companies, payroll providers, or screening providers involved in placing and paying them. As a recruitment business, this is where our most significant modern slavery risks lie.
- **Goods and services:** property, facilities management (including cleaning and security), professional services, information technology, media, job boards and stationery.

Our Commitment

Gravitas Recruitment Group is committed to ensuring that there is no slavery, forced servitude or compulsory human labour, abuse of power over vulnerable individuals, human trafficking, or any other forms of exploitation as documented in the Modern Slavery Act 2015.

We expect our suppliers, and suppliers within their supply chain, to work to high ethical standards and to operate in a legally compliant and professional manner. Our approach is risk-based: we focus our efforts on the parts of our business and supply chains where the risk of exploitation is greatest.

All employees, candidates, workers, customers, and business partners are encouraged to report any concerns related to the direct activities or the supply chains of the company. Our whistleblowing procedure is designed to make it easy for employees to make disclosures without fear of retaliation. Anyone inside or outside the business, including candidates, contractors and clients, can raise a concern confidentially with the UK Legal Department at Legal@gravitasgroup.com, or contact the Modern Slavery & Exploitation Helpline on 08000 121 700, which is available 24 hours a day.

Our policies and procedures are under constant review to ensure ongoing compliance with our standards.

Our Policies in relation to Slavery and Human Trafficking

The following policies set out our approach to identifying and preventing slavery and human trafficking in our business and supply chains. They are available to all staff on the intranet system and are reviewed annually by the UK Legal Department.

- **Whistleblowing Policy:** enables staff and others to raise concerns confidentially and without fear of retaliation.

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- **Candidate Onboarding and Right to Work Procedure:** requires identity and right-to-work checks on every candidate before placement, and sets out the warning signs of exploitation that staff must escalate.
- **Employee Handbook:** requires all staff to act ethically and in compliance with the law.
- **Anti-Bribery and Corruption Policy:** prohibits staff and anyone acting on our behalf from offering, paying or accepting bribes, helping to prevent the corruption that can enable exploitation and human trafficking, such as payments for false documents or to bypass checks.
- **Equal Opportunities Policy:** commits us to treating all candidates, contractors and staff fairly and without discrimination, which helps protect people who may be vulnerable to exploitation.

In line with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, we do not charge candidates or workers any fee for finding them work.

Due Diligence Processes

We carry out the following due diligence in relation to slavery and human trafficking in our business and supply chains:

- **Candidates and workers:** before any placement we carry out identity and right-to-work checks on each candidate in line with UK government requirements. Our consultants look for warning signs of exploitation, such as several candidates sharing the same bank account, address or phone number, a third party speaking or applying on a candidate's behalf, or a candidate not holding their own identity documents. Any concern is escalated to our Customer Care team before the placement goes ahead.
- **Umbrella and payroll companies:** contractors may only be paid through umbrella companies on our approved list. Before approval we check that the provider holds accreditation from a recognised body, such as the FCSA, and confirms that workers are paid at least the National Minimum Wage without unlawful deductions. Approved providers are reviewed annually.
- **Suppliers:** we carry out checks on the governance and financial standing of new suppliers. New suppliers, particularly those in higher-risk categories such as facilities services, complete a modern slavery questionnaire as part of onboarding, and all suppliers and those within their supply chains are expected to comply with the Modern Slavery Act 2015.
- **Clients:** our identity and right-to-work checks apply to every candidate and contractor we place, whatever the client's terms. Many of our clients, including public sector bodies, also require us to comply with the Modern Slavery Act 2015 under their contract terms. Consultants are expected to report any concerns about working conditions they become aware of at a client site, and these are escalated to our Customer Care team.

Remediation: if we identify, or are told about, a possible case of modern slavery or human trafficking, our Customer Care team will escalate it to a director, who will decide on next steps. Our priority is the safety and wellbeing of the individual concerned. Where appropriate, we will refer the matter to the police or the Modern Slavery & Exploitation Helpline, and we will suspend or end our relationship with any supplier, umbrella company or client found to be involved.

Risk Assessment and Management

We have assessed the parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, taking into account the type of work, the sector and country, and how workers are recruited and paid. The main areas, and the steps we take to manage them, are:

- **Contractors (low risk):** our contractors are predominantly skilled professionals in technology, insurance and banking, so the risk is lower than in sectors such as logistics, hospitality or care.

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However, contractors who are new to a country, or who are paid through third-party intermediaries, may still be vulnerable to exploitation. Managed through our identity and right-to-work checks, red-flag escalation and direct contact with each contractor.

- **Umbrella and payroll companies (medium risk):** non-compliant intermediaries can withhold pay or make unlawful deductions. Managed through our approved-provider list and accreditation checks.
- **Overseas operations and partners (low risk):** we operate in the UK, the Netherlands, Germany, Hong Kong, mainland China and Singapore, and legal protections for workers differ between these countries. Managed through local compliance checks and partner due diligence.
- **Information technology (low risk):** the manufacture of electronic hardware carries known risks further down the supply chain. Managed by buying from established suppliers that publish modern slavery statements.
- **Internal staff and other suppliers (low risk):** our internal staff are directly employed professionals recruited through our own HR process, including right-to-work checks. Professional services, media, job boards and stationery are considered low risk and are covered by our standard supplier checks.

We review this assessment annually and whenever we enter a new country, sector or supplier category. During the financial year, no instances of modern slavery or human trafficking were identified in our business or supply chains.

Measuring Effectiveness

We use the following measures to monitor whether our approach to preventing modern slavery and human trafficking is working:

- **Training:** the percentage of new starters who complete modern slavery awareness training as part of their induction.
- **Candidate checks:** the number of placements where warning signs were identified and escalated to our Customer Care team, and the outcome of each escalation.
- **Umbrella and payroll companies:** the number of approved providers reviewed during the year, and any that were removed from our approved list.
- **Suppliers:** the number of new suppliers that completed our modern slavery questionnaire during onboarding.
- **Reporting:** the number of modern slavery concerns raised through our whistleblowing procedure or with the UK Legal Department, and how each was resolved.

During the financial year ended 30 November 2025, 100% of new starters completed modern slavery training, 6 approved umbrella and payroll providers were reviewed, and no modern slavery concerns were raised through our whistleblowing procedure or with the UK Legal Department. We will continue to develop these measures and will report on them in our statement for the financial year ending 30 November 2026.

Training

All employees have access to our policies and procedures regarding human trafficking, forced labour, servitude, and slavery. They are expected to comply with all laws and act in accordance with local guidelines and regulations. All new starters receive modern slavery awareness training as part of their induction, covering what modern slavery is, the warning signs and how to report a concern. Our training programme is reviewed regularly, and further training will be provided as required.

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Approval

This statement was approved by the Board of Directors of Gravitas Recruitment Group Limited on 16/10/2026 and is signed on its behalf by:


Jonathan Ellerbeck (Oct 16, 2026 16:51:54 GMT+1)

Jonathan Ellerbeck
16/10/2026

Chief Executive Officer
Gravitas Recruitment Group Limited

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