

Modern Slavery Policy for Athona

Introduction

This statement sets out Athona's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st August 2024 to 31st July 2025.

As part of the recruitment industry specialising in the healthcare and education sectors, Athona recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Athona is absolutely committed to preventing slavery and human trafficking in its business activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Athona Ltd & Athona Education Ltd.

Athona was formed in 2003 in response to a demand for honest, reliable and professional recruitment solutions. Focusing on specialist recruitment in the hospital doctors, allied health, nursing and education markets.

Athona Ltd's Healthcare divisions supply healthcare professionals via approved National Staffing Frameworks for supply to the NHS Sector and service level agreements with private healthcare providers throughout the UK.

Athona Education Ltd's Education divisions supply qualified teachers & support staff to nursery, primary & secondary schools and nurseries via supply service level agreements in London and surrounding counties.

Countries

Athona currently operates in the following countries:

- United Kingdom

Responsibility

Responsibility for Athona's anti-slavery initiatives is as follows:

- **Policies:** The Founder has ultimate responsibility for enforcement of the policy throughout Athona. The Modern Slavery Act Policy Statement has been written in response to the findings of our risk assessments within our business activities and to demonstrate an organisation wide commitment to act ethically within the law.

- **Policy effectiveness and review:** The policies will be reviewed by the Finance Director, Director of Quality and Compliance, and Human Resources at least annually, or sooner if necessary following any major supply chain or organisational changes.
- **Risk assessments:** Finance Director, Director of Quality and Compliance, and Human Resources have undertaken the necessary risk assessments on behalf of Athona.
 - **Compliance with National Minimum Wage** – All employees are paid above the national minimum wage
 - **Compliance with Apprenticeship Wage** – All apprentices are on approved government training programmes and paid in accordance with the apprenticeship wage requirements.
 - **International Candidates / Visa Sponsorship** – Athona does not provide visa sponsorship for migrant workers therefore minimising modern slavery risks of tied contracts
 - **Whistleblowing** - All Athona employees and Athona temporary staff have access to our whistleblowing policy via their staff handbooks issued at recruitment. All staff are encouraged to highlight any whistleblowing concerns inside or outside of our organisation with confidence that they will be supported and treated fairly when doing so.
 - **Supply Chain Assessment** – All suppliers have been assessed for their compliance with ISO9001 Quality Management for many years which ensures effective organisational practices, all suppliers will be sent communication regarding the Modern Slavery Act and their responsibility to comply within the law, all new suppliers will be assessed for their compliance with the Modern Slavery Act going forward.
- **Investigations/due diligence:** The Finance Director, Director of Quality and Compliance and Human Resources are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** Employees and suppliers will receive training material to ensure that they provide safe working conditions where necessary, treat all workers with dignity and respect, and act ethically and within the law in their use of labour. We have chosen to broadly share this information to help others to better understand and respond to any identified slavery and human trafficking risks.

Relevant policies

Athona operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** Athona encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Athona. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Athona's whistleblowing procedure is designed to make it easy for workers to make confidential disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential email whistleblowing@athona.com

- **Employee core values** Athona's core values makes clear to employees the actions and behaviour expected of them when representing Athona. Athona strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Supplier code of conduct** Athona is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Athona will work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions if concerns arise. However, serious violations of Athona's supplier code of conduct will lead to the termination of the business relationship and referral to the relevant authorities.
- **Recruitment policy** Athona only uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All Agencies going forward will be required to agree to our supplier code of conduct.
- **Equality and Diversity Policy** - Athona embraces the diversity of the communities we serve and will seek to promote the benefits of diversity in all of our business activities. All employees are made aware of the policy at recruitment.
- **Corporate Social Responsibility Policy** - Athona takes responsibility for environmental awareness, charitable giving, development the company culture and monitoring of staff wellbeing, and apprenticeship opportunities.
- **Health and Safety Policy** – All employees are provided training upon induction and are encouraged to take a shared responsibility for the health, safety and wellbeing of their working environment and colleagues around them.

Due diligence

Athona will undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Athona's due diligence and reviews will include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- conducting where necessary supplier audits or assessments using our own staff any suppliers which have a greater degree of focus on slavery and human trafficking where general risks are identified
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

Athona has reviewed its key performance indicators (KPIs) against the Modern Slavery Act 2015. As a result, Athona will continue to:

- Enhance the existing system for supply chain verification whereby Athona evaluates potential suppliers before they enter the supply chain; and
- review its existing supply chains

Training

We require all staff and existing suppliers to complete training on modern slavery as a commitment to Athona's wider equality and diversity and human rights policy.

Athona's modern slavery training will cover:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- how to identify the signs of slavery and human trafficking
- what initial steps should be taken if slavery or human trafficking is suspected
- how to escalate potential slavery or human trafficking issues to the relevant parties within Athona
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative
- what messages, or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps Athona should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from Athona's supply chains.

This statement has been approved by Stewart London, Founder who will ensure the policy is reviewed and updated annually.

Stewart London

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