

SILVMARC LTD

Anti-Slavery & Human Trafficking Policy

Policy document

Document reference	SILV-POL-01
Version	1.0
Status	Approved
Effective date	June 2026
Next review	By 31 May 2027
Policy owner	Director
Approved by	Bogdan Barna, Director

1. Purpose and scope

SILVMARC LTD is committed to acting ethically and with integrity in all its business relationships, and to implementing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere in its own business or its supply chains.

This policy applies to the director and to all employees, workers, agency and temporary workers, subcontractors, suppliers, and other third parties acting for or on behalf of SILVMARC LTD. It reflects our commitment to complying with the Modern Slavery Act 2015.

2. Policy statement

SILVMARC operates a zero-tolerance approach to modern slavery and human trafficking. We are committed to:

- ensuring that no form of slavery, servitude, forced or compulsory labour, or human trafficking takes place in our business or supply chains;
- treating every worker we place fairly, lawfully, and with respect;
- never charging a work-seeker a fee for finding or securing work; and
- acting promptly and appropriately wherever a concern is identified.

3. What is modern slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes a number of forms, all of which involve one person depriving another of their liberty in order to exploit them for personal or commercial gain. These include:

- Forced or compulsory labour — work or service exacted under the menace of a penalty, for which the person has not offered themselves voluntarily.
- Bonded labour (debt bondage) — where a person is forced to work to repay a debt, often on terms that are never made clear or that are impossible to repay.
- Human trafficking — arranging or facilitating the travel of another person with a view to their exploitation.
- Servitude — the obligation to provide services, imposed by coercion.
- Other forms of exploitation, including sexual exploitation, criminal exploitation, and domestic servitude.

4. Responsibilities

The director of SILVMARC holds overall responsibility for ensuring this policy complies with our legal and ethical obligations and is applied throughout the business. Everyone working for or with SILVMARC is responsible for understanding this policy, complying with it, and reporting any concerns or suspected breaches. The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control.

5. Due diligence and the indicators we watch for

As part of our efforts to identify and mitigate risk, we:

- verify the identity and right to work of every worker before placement, and retain evidence of those checks;
- pay workers through our payroll provider into a bank account in the worker's own name;
- assess our supply chain partners, including our payroll provider, for their commitment to anti-slavery standards; and
- remain alert to potential indicators of modern slavery.

Indicators we are alert to include, but are not limited to:

- wages being paid into an account that does not belong to the worker, or several workers being paid into the same account;
- a third party speaking for, or appearing to control, a worker, their documents, or their money;
- multiple workers sharing a single address, phone number, or emergency contact;
- a worker showing signs of fear or anxiety, or being unable to move or communicate freely; and
- a worker who is unaware of their terms of engagement, or who does not appear to hold their own identity documents.

6. Reporting concerns

Anyone who suspects that modern slavery or human trafficking may be occurring — whether within our business, among the workers we place, or in our supply chain — must report it. Concerns can be raised directly with the director at contact@silvmarc.co.uk or +44 20 3917 4761, or through the routes set out in our Whistleblowing Policy. Concerns may also be reported to the Modern Slavery & Exploitation Helpline on 08000 121 700. If a person is in immediate danger, the police should be contacted on 999.

7. Breaches of this policy

Any breach of this policy will be taken seriously. Workers or other parties found to be in breach may have their engagement or contract with SILVMARC terminated. We may also terminate our relationship with any supplier, subcontractor, or business partner found to be in breach of this policy or otherwise involved in modern slavery or human trafficking.

8. Monitoring and review

This policy is owned by the director and will be reviewed at least annually to ensure it remains effective and compliant with current legislation and guidance.

Approval

This policy has been approved and adopted by the director of SILVMARC LTD and is reviewed at least annually.

Signed: Bogdan Barna

Name: Bogdan Barna

Position: Director, SILVMARC LTD

Date: 2026-06-27

Audit trail

Details

FILE NAME	SILVMARC-Anti-Slavery-and-Human-Trafficking-Policy.docx - 27/06/2026, 09:02
STATUS	Signed
STATUS TIMESTAMP	2026/06/27 08:05:17 UTC

Activity

SENT	bogdanbarna@silvmarc.co.uk sent a signature request to: Bogdan Barna (bogdanbarna@silvmarc.co.uk)	2026/06/27 08:02:28 UTC
SIGNED	Signed by Bogdan Barna (bogdanbarna@silvmarc.co.uk)	2026/06/27 08:05:17 UTC
COMPLETED	This document has been signed by all signers and is complete	2026/06/27 08:05:17 UTC

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