

Brightwork

Modern Slavery and Human Trafficking Statement 2026–2027

Financial Year:
1 January 2025 –
31 December 2025



Table of Contents

Executive Summary.....	03
Introduction.....	04
About Us.....	05
Organisational Structure and Supply Chain.....	06–09
Policy Statement.....	10
Due Diligence.....	11
Training and Awareness.....	12–13
Key Performance Indicators (KPIs) & Risk Assessments.....	14–20
Collaboration and Communication.....	21–23
Governance and Oversight.....	24–28
Spotlight on Best Practice.....	29–31
Future Plans.....	32
Summary.....	33

Executive Summary

This statement sets out the actions taken by Brightwork Limited (Company Registration Number – SC296104) during the financial year ending 31 December 2025, to identify, address and reduce the risk of modern slavery, labour exploitation and human trafficking within our operations and supply chains. It reflects our continued commitment to ethical recruitment, worker welfare, and responsible labour practices and is published in accordance with Section 54 of the UK Modern Slavery Act (2015). For over 10 years, Brightwork has published annual Modern Slavery Statements.

As Scotland's largest recruitment and workforce provider, Brightwork recognises its responsibility operating within labour intensive sectors, including warehousing and food production. These operating models present inherent risks of worker vulnerability and exploitation. We therefore continue to strengthen our standards, systems, and controls, including enhanced Right to Work checks, improved onboarding processes to identify indicators of exploitation or control, and multilingual worker information to support awareness of rights.

During the reporting period, we strengthened our governance, risk identification, and supplier assurance processes and continued to embed modern slavery considerations across the business. Our approach is informed by regulatory developments, investor expectations, and recognised best practice frameworks, including the CCLA Modern Slavery Benchmark framework.

Key highlights during the period include:

- Maintenance of ISO 9001 & 14001 Standards
- Contribution to the development of the UK Government's Transparency in Supply Chains Guidance
- Approved supplier of the Scottish Government Temporary and Interim Framework for Administration & Catering and Manual Staffing
- Delivery of nine modern slavery-focused stakeholder events
- Continuation of leading Scotland Against Modern Slavery (SAMS) initiative increasing corporate membership to 69 partners
- As part of Staffline Group, launched the Staffline Supplier Code of Conduct
- Strengthened internal due diligence and preventative controls
- Expanded the use of technology to identify risk and support reporting to authorities
- Enhanced worker voice mechanisms and reporting routes
- Reviewed and updated mandatory learning following a decline in internal reporting volumes during 2024, resulting in a 14% increase of reports raised by internal staff
- As part of Staffline Group, Brightwork achieved a Bronze EcoVadis rating, placing Staffline in the top 35% of assessed companies globally

Our approach is guided by the Find it, Fix it, Prevent it principles underpinning the CCLA framework:



Find it

Through intelligence-led monitoring, audits, risk indicators, and workforce engagement.



Fix it

By prioritising safeguarding, supporting victims, enabling access to remedy, and cooperating with enforcement bodies.



Prevent it

By strengthening controls, improving training, challenging unsafe practices, and embedding learning across the business.

Introduction

Modern slavery remains a hidden, complex and evolving crime that disproportionately affects vulnerable individuals within legitimate labour markets. It includes forced labour, servitude, labour exploitation, human trafficking and represents a serious violation of fundamental human rights. Despite increased awareness, modern slavery continues to affect millions globally, often remaining concealed within everyday employment settings.

As a leading provider of recruitment and workforce solutions at scale, Brightwork recognises that the nature of our business brings both responsibility and inherent risk. We are committed to creating ethical, fair, and sustainable employment opportunities and ensuring that worker welfare is central to everything we do. Preventing modern slavery and exploitation is one of our highest priorities and underpins how we operate across our business and labour supply chains.

The UK authorities released data at the end of 2024 stating 19,125 potential victims of Modern Slavery were referred. The [Scottish Government](#) published 920 of these referrals were in Scotland.

- *23% of people referred were British Nationals.*
- *31% of these were children.*

(Anti-slavery International 2026)

Brightwork takes a zero-tolerance approach to modern slavery and exploitation. However, we do not consider declarations of “no risk” or “no cases” to be credible in the sectors in which we operate. Victims of exploitation rarely self-identify and may not recognise their own exploitation. As a result, risks are often identified through professional curiosity, third-party observation, data-led intelligence, audits, and workforce engagement, rather than straightforward disclosure. For this reason, we place strong emphasis on training, data analysis, intelligence sharing, and early intervention, enabling risks to be identified and addressed as early as possible. Brightwork understands Scottish specific risks such as rural isolation, seasonal work and housing pressures and factors such things into our awareness of exploitation.

Brightwork has published a Modern Slavery Statement annually for over ten years, reflecting our commitment to transparency, accountability, and continuous improvement. Our approach aligns with the UK Modern Slavery Act, the Human Trafficking and Exploitation (Scotland) Act 2015, the Ethical Trade Initiative (ETI) Base Code and relevant international standards.

During the period, we responded to emerging risks including:

- Increased use of fraudulent identity documentation and digital manipulation
- Heightened worker vulnerability linked to economic pressures
- Shifts in enforcement activity and regulatory expectations
- A greater emphasis on workforce voice, prevention, and early detection

We also adapted to the evolving enforcement landscape, including the establishment of the **Fair Work Agency (FWA)** in April 2026; we remain actively engaged with the FWA to support effective labour market oversight.

About Us

Established in 2006, Brightwork is Scotland's largest recruiter and staffing provider, delivering recruitment and workforce solutions to leading brands.

With a dedicated Scottish operational team of over 65 colleagues, Brightwork enables an average of more than 2,500 individuals into **good work** every day, operating across multiple clients and playing a critical role in supporting essential supply chains.

We support clients across a wide range of industries through services including high volume recruitment, on site workforce management, and training and development. Operating at scale within labour intensive sectors such as food packaging and production, logistics, automotive, security, manufacturing and driving, brings a heightened risk of worker vulnerability.

Our recruitment processes are supported by experienced recruitment teams and innovative technologies, including our bespoke candidate management system, Talent.One, and Have Your Say, our industry leading customer experience management platform. These tools enhance worker engagement, satisfaction, and retention, while our integrated AI-enabled chat technologies support the prompt handling of enquiries, helping to ensure candidates and workers are directed to the right support at the first point of contact.

Our purpose - **enabling people into good work** - is underpinned by a strong commitment to ethical labour practices, transparency, and worker welfare.



Organisational Structure & Supply Chain

Brightwork is a Scotland-based recruitment agency that specialises in providing recruitment and workforce management solutions to businesses in various industries. With branches located in Glasgow and Elgin, we support our customers from the Borders up to the Central Belt, spanning across to the Western Isles and extending to the most northerly points of Scotland. Providing onsite solutions services to 20+ locations across the Central Belt, we have a permanent presence within our customers' sites, providing a dynamic and flexible resourcing service, on location, right at the heart of their businesses.

Brightwork is a subsidiary of Staffline Recruitment GB; one of three divisions along with Datum RPO, and Staffline Recruitment Ireland, which form Staffline Group Plc. Staffline Recruitment GB, also trades under the Omega and A La Carte brands, which also forms part of Staffline Group Plc.

Further details on the Group structure are available on the [Staffline Group Plc website](#).

Centralised governance, compliance, and risk management functions ensure that ethical standards are applied consistently across the Group, while ensuring that controls and oversight are proportionate to identified risk. Across all divisions, the Group continues to integrate technology and uphold ethical practices, reinforcing our commitment to worker welfare, transparency, and regulatory compliance.

Brightwork, supported by Staffline's central governance functions, maintains its own dedicated Scottish compliance and operational teams who report into a dedicated investigations team who are responsible for identifying, assessing, and addressing modern slavery risk throughout our business and supply chain.

This work is aligned to the UK Government's Modern Slavery Strategy objectives:

1

Pursue

Working collaboratively with our clients, supply chain partners and non-governmental organisations that share our values to identify, disrupt, and respond to modern slavery risks, and support investigations and prosecutions where criminal activity is suspected.

2

Present

Educating colleagues, clients, and suppliers to recognise indicators of exploitation, maintaining robust policies and processes and regularly reviewing and updating risk assessments to address emerging and evolving risks.

3

Protect

Safeguarding our workforce, business, and supply chain by analysing data, strengthening reporting mechanisms, and identifying and escalating concerns through appropriate internal and external channels.

4

Prepare

Maintaining an established framework to identify and support potential victims through appropriate, effective actions centred on individual needs, including supporting recovery and reintegration with relevant specialist agencies and safeguarding partners.

Supply Chain

With a commitment to compliance and ethical standards, and a responsibility to recognise the inherent risks for labour exploitation within our sectors we take a proactive approach beyond our compliance and legal obligations to actively identify, disrupt and prevent abuse wherever it may arise in our operations and supply chain. We utilise data insights and intelligence shared through multi-agency anti-slavery partnerships in which we actively participate to help shape and inform our risk and prevention measures.

Brightwork's supply chain management is based on good compliance, transparency, and ethical standards. Brightwork, Staffline and Datum RPO hold Fair Work Agency gangmaster licences and are committed to working only with partners who share its high standards and adhere to relevant regulatory requirements.

This commitment is underpinned by Brightwork's alignment with Staffline's ISO 9001 and ISO 14001 certifications, together with our SafeContractor accreditation and our EcoVadis Bronze rating, which positions Staffline within the top 35% of assessed organisations. We also engage in recognised ethical recruitment initiatives, including the Stronger Together 360° assessment tool. Furthermore, as part of the Staffline Group, Brightwork operates within the framework of Staffline's Sedex membership and the completion of a comprehensive four pillar SMETA audit on a biennial basis.

In line with a value-chain approach, Brightwork also considers risks beyond labour provision. Our risk assessments include suppliers and service providers such as background screening organisations, training providers, technology platforms, and worker support services. While these suppliers do not typically present the same modern slavery risk profile as labour supply, we apply proportionate due diligence to ensure alignment with our ethical standards, policies, and expectations.

We recognise that modern slavery risk may arise through both our own operations and our wider labour supply chain where operationally required and extend beyond direct labour recruitment (Tier 1) into the use of vetted recruitment partners (Tier 2). In response, we have strengthened our due diligence approach to better address this risk, including reducing the number of second-tier labour providers we engage with. Over 55% of these partners currently hold an active Fair Work Agency gangmasters licence.

Following the launch of Staffline's Supplier Code of Conduct in 2025, all our trusted partners have confirmed their commitment to full compliance and alignment with this code and have provided assurances that staff training has been completed to a high standard within their organisation.

All temporary contract workers regardless of their engagement route are provided with training during induction and several worker surveys to support and identify potential risk. Where instances of exploitation or potential Modern Slavery are identified within our supply chain, we would encourage all parties to work collaboratively and with relevant authorities to identify any root causes and ensure all affected individuals are identified and supported. Where a partner fails to engage in good faith or to remediate concerns effectively, Brightwork will take decisive action, including terminating the relationship where necessary, to protect workers and uphold our ethical standards.

Supply by Sector (2023-2025):

Sector(s)	2025	2024	2023
Automotive & Manufacturing	15%	10%	13%
Driving	9%	13%	8%
Food & Drinks (and related)	40%	41%	29%
Retail and Logistics	46%	46%	53%
Other	4%	3%	4%

N.B. The basis of the sector division has altered from previous years due to the division of client roles spanning more than one sector.

Our Focus

Brightwork is committed to delivering responsible ethical recruitment solutions across both private and public sectors, supporting individuals into sustainable employment and develop skills. We achieve this through fair and clear terms, equal opportunities for all, development pathways, and the promotion of safe, respectful, clean, and healthy work environments.

Our Values

Brightwork's goal is to support people into good work, enabling both our workforce and our customers to fulfil their goals and aspirations. We achieve this through our company values and our human-centric approach, and that is embedded in our day-to-day behaviours and our engagement with stakeholders.

At the heart of our business are the individuals we support into work; through the integration of technology, including AI-enabled tools, we have improved our job search functionality to help individuals to 'Find Me Work' more effectively. These dynamic solutions allow support through an individual's journey, enabling earlier identification of concerns, and to provide timely and appropriate support along the way. We continue to innovate to improve accessibility, transparency, and worker experience. Our People Team plays a critical role to help embed the culture and values of Brightwork. Through targeted initiatives and campaigns, including Women in Leadership, Pride Month, Mental Health Awareness, Neurodiversity Celebration Week, and Anti-Slavery awareness. Brightwork, in line with Staffline, actively promotes inclusion, wellbeing, and respect, reinforcing behaviours that support ethical recruitment and worker protection.

Strengthening collaboration and partnership is a key element of our approach to preventing and addressing modern slavery. During 2023, we prioritised building relationships with charitable and specialist organisations, which enabled us to enhance support pathways and strengthen our response to potential cases. 2024 saw our focus shift to supporting individual cases, increasing employment opportunities, and working collaboratively with clients to deliver positive outcomes for affected individuals. 2025 presented an opportunity to increase awareness with our stakeholders, highlighting sector specific risks and developing internal controls to improve due diligence. Greater emphasis was given to supply chains and market analysis, which led to the introduction and launch of Staffline's Supplier Code of Conduct, and various market review exercises which helped us to measure our performance, compliance, and capabilities, relative to the performance of our competitors and considering published best practice.

The aim for 2026 is to continue to build on this foundation, review our risk profile and develop our strategic approach to address key risk areas.

Brightwork maintains a worker-centric approach, respecting individual preferences and needs, we work collaboratively with clients and partners to support safe and appropriate outcomes.

Our commitment to preventing modern slavery and human trafficking is embedded throughout our operations and supply chains. [We apply our values consistently](#) and do not knowingly engage with organisations that tolerate slavery, human rights abuses or unethical recruitment practices.

This commitment is underpinned by the following principles:



Be Authentic: We prioritise worker experience and welfare, treating everyone with respect and honesty. All concerns are investigated by an independent specialist team and, where appropriate, escalated to relevant authorities.

Stand Up & Be Counted: We are a responsible recruiter who supports reporting and identifying any concerns without fear of reprisal and working collectively to champion meaningful change.

Do The Right Thing: Committed to doing the right thing, for the right reason, ethically, transparently, and consistently.

Always Evolving: We adapt our strategies to combat the evolving nature of modern slavery, utilising data insights, and trend analysis to uncover emerging risks and methods to disrupt harmful practices.

Embrace Teamship: Fostering a supportive culture that enables the early identification of concerns, underpinned by a victim-centred approach and effective collaboration with internal teams, clients, and statutory authorities.

Our commitment to protecting all stakeholders is reinforced by accessible internal and external grievance mechanisms. These mechanisms support the reporting, identification and resolution of concerns related to modern slavery, unfair recruitment practices, or human rights abuses, ensuring individuals are supported and risks are addressed effectively. Further details, including relevant contact information, are provided later in this document.

Policy Statement

Brightwork has a zero-tolerance approach to modern slavery and human trafficking and all forms of exploitation across our operations and supply chains. We recognise that slavery and human trafficking constitute a serious violation of human rights and have no place in any part of our business or the wider value chain in which we operate.

We are committed to conducting our business with integrity and will not knowingly support, engage with, or benefit from any organisation involved in slavery, human trafficking, or unethical recruitment practices. We expect all suppliers, contractors, labour partners, and other business partners to share our commitment to upholding human rights and preventing modern slavery.

To fulfil our commitment, Brightwork will:

- **Identify and assess modern slavery risk** by conducting risk-based due diligence across our operations and supply chains, including labour providers and other relevant service partners.
- **Take appropriate and proportionate action** where risks or concerns are identified, including working collaboratively with suppliers and partners to improve practices, implementing corrective actions and, where necessary, escalating concerns to relevant authorities.
- **Prevent exploitation through awareness and training**, by providing mandatory modern slavery training for all employees, and targeted training, guidance and roundtables to suppliers and partners to support early identification of indicators and effective responses.
- **Support collaboration and shared learning**, including working with customers, suppliers, and relevant stakeholders by sharing knowledge, experience, and good practice to strengthen collective approaches to preventing modern slavery.
- **Encourage and support reporting**, ensuring that all employees, workers and third parties can safely raise concerns or suspected cases of modern slavery or human trafficking through accessible internal and external reporting channels. Further details, including relevant contact information, are provided later in this document.
- **Protect the rights and wellbeing of workers**, including safeguarding freedom of movement and association, preventing unfair recruitment practices, and ensuring access to appropriate grievance mechanisms and support.
- **Review and strengthen controls on an ongoing basis**, regularly monitoring and reviewing our policies, procedures, and practices to assess their effectiveness and respond to emerging risks and evolving exploitation methods.

Brightwork is committed to continuously improving in our approach to preventing modern slavery and human trafficking and to comply with all relevant laws, regulations, and licensing requirements.

Our policies are hosted on a live environment for all employees to access at any time and are supported with the additional awareness-checking learning materials on our learning platform. Together, these policies and resources reinforce our commitment to protecting human rights and eliminating unethical recruitment practices across our business and supply chains.

Due Diligence

We undertake robust, risk-based due diligence across our operations and supply chains to identify, assess, and address modern slavery risks. This includes supplier audits, worker interviews, data analysis, and intelligence sharing.

Where risks are identified, concerns are escalated through defined prioritisation and governance pathways, with oversight provided by Staffline's Governance Director and the Board. Engagement with the Fair Work Agency and other authorities occurs where appropriate, with individual safety and dignity as the primary consideration.

Our due diligence processes are informed by recognised frameworks, including the Government's Modern Slavery Assessment Tool (MSAT) and Stronger Together's 360° toolkit, and are applied proportionately based on sector, geography, labour model, and historical risk indicators. This risk responsive approach enables us to focus resources where the potential for exploitation is greatest and establish a strategy based on prioritisation.

Through ongoing due diligence activity, including supplier audits, worker interviews, welfare checks, data analysis, and intelligence sharing, we have identified potential modern slavery risk indicators within our operations and supply chain. While not all indicators result in confirmed cases of modern slavery, each concern is treated seriously and escalated through our established safeguarding, investigation, and referral processes. All cases of potential modern slavery and/or exploitation are managed by our dedicated Investigations Team who prioritise and escalate to the Governance Director who subsequently informs our Board of Directors for input, review, and remedy. As part of our process with all cases, they are assigned a prioritisation level which identifies urgency, risk and who needs to be involved actively or informed of any updates. Where appropriate this includes engagement with the Fair Work Agency and other relevant authorities, with the safety, wellbeing, and dignity of the individual(s) as the primary consideration at all times.

Our approach to due diligence is designed not only to identify risk, but to drive meaningful action and continuous improvement. We focus on proactively reducing the risk of forced labour and human trafficking through collaboration with suppliers, clients, non-governmental organisations, enforcement bodies, and other stakeholders. Where risks or issues are identified, we seek to understand root causes, implement corrective actions, and embed learning to prevent recurrence. Learning from investigations has resulted in tangible changes, including strengthened onboarding controls and conflict of interest registers introduced following identified risks.

Technology and data play an increasingly significant role in our due diligence framework. We have embedded the use of identity document validation technology (IDVT) from a leading certified DVS/IDSP to support identification of any imposters, fraudulent documentation, and/or digital manipulation; further developments will continue throughout 2026 to strengthen our processes in this area. We utilise data analytics, audit findings, intelligence reports, and insights from our internal investigation and specialist teams to identify emerging risks and red flags. This intelligence-led approach enables us to respond to evolving exploitation methods and apply lessons learned from real-world cases, ensuring human rights considerations remain central to our decision-making.

Our governance and control environment is supported by recognised certifications and external validation. Brightwork aligns with Staffline's ISO 9001 (Quality Management System) and ISO14001 (Environmental Management System) accreditations, our SafeContractor accreditation, and our EcoVadis Bronze rating (which places Staffline in the top 35% of audited businesses). In addition, as part of Staffline, Brightwork benefits from Staffline's Sedex membership and the completion of a comprehensive 4-pillar Sedex Members Ethical Trade Audit (SMETA) on a 2-yearly cycle.

Our due diligence practices are aligned with the UK Modern Slavery Act, the UN Guiding Principles on Business and Human Rights, the OECD's Six-Step Due Diligence Framework, and the CCLA Modern Slavery UK Benchmark (2026). We will continue to review and strengthen our approach to ensure it remains effective, intelligence-led, responsive, and aligned with evolving best practice and regulatory expectations.

Training and Awareness

Training is central to our prevention strategy. All employees complete mandatory modern slavery training through our online training platform, supplemented by role specific and risk-based learning. This approach aligns training intensity with identified modern slavery risks across our operations and labour supply chains.

Our mandatory learning provides a consistent baseline understanding across the organisation. Training content is periodically reviewed and updated to reflect emerging risks, regulatory developments, and evolving best practice. In 2026, Brightwork will be actively involved in the launch of Staffline's Modern Slavery Ambassador training programme aimed at strengthening operational staff capability through advanced training on the complexities of modern slavery and exploitation, and on supporting affected individuals to access justice and appropriate remediation.

We ensure our wider workforce, including temporary workers, receive clear, accessible, and practical information during their inductions. This is supported by our Worker Handbook - published in English and available in ten additional languages to address language barriers and promote inclusivity; a key consideration for potentially vulnerable workers.

The handbook provides clear guidance on:

- Worker rights and standards of fair treatment
- How to raise concerns or seek support safely including whistleblowing
- Practical signposting to internal and external support services

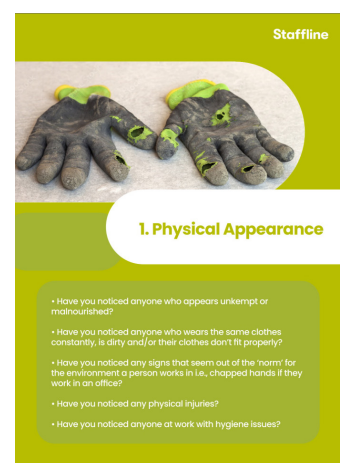
The content is routinely reviewed and strengthened, with enhanced modern slavery guidance and clearer signposting incorporated to reflect learning from intelligence, investigations, and worker feedback. We utilise our data to identify if any additional translations of our worker handbook are required in order to support our workforce.

To reinforce recognition and early identification across our business, Staffline has a well embedded 7 Red Flags programme, this simplifies the often complex identification of modern slavery indicators, into clear, practical warning signs.

This programme is embedded across:

- Internal communications
- Workforce engagement materials
- External channels including our website, social media, and marketing collateral

The programme actively encourages early and open reporting, including where evidence may be limited, helping to remove fear or uncertainty around raising concerns. The 7 Red Flags framework is aligned to the International Labour Organization (ILO) Indicators of Forced Labour, ensuring consistency with internationally recognised standards.



Any suspicions or allegations of modern slavery, forced labour, or exploitation are promptly escalated to our Independent Investigations Team. The team comprises of experienced professionals with backgrounds in law enforcement and regulatory bodies such as the Fair Work Agency, ensuring a high standard of impartiality and investigations expertise.

The team undertakes:

- Prompt assessment of intelligence, referrals, or complaints
- Assigns a prioritisation status
- Thorough, welfare focused investigations
- Appropriate internal escalation and collaboration with authorities when required
- 360° reviews for prevention and remedy

Members of the Investigations team also receive specialist external training, including the Stronger Together – Advanced Tackling Modern Slavery in Business programme, and Coventry City Council’s Modern Slavery Advocates training, to maintain expertise and support continuous improvement.

Brightwork supports and contributes to Staffline’s approach to intelligence gathering and sharing, which has been formally recognised, including several commendations from the Home Office, alongside positive feedback from enforcement partners - demonstrating the effectiveness of our reporting and engagement framework.

Brightwork maintains a zero-tolerance stance on modern slavery-related abuses. We explicitly prohibit:

- Any fees or payments for employment
- Retention or withholding of personal identity documents
- Forced, bonded, or involuntary labour practices

Brightwork delivers bespoke training to Scottish clients and communities through the Scotland Against Modern Slavery initiative, for which they have received recognition from Scottish government and law enforcement agencies.

In addition, we conduct preventative awareness campaigns aimed at prospective workers to raise awareness of:

- Recruitment scams
- Criminal exploitation risks
- Unsafe or illegal employment practices
- Illegal money lenders and loan sharks



These campaigns are identified as priorities based on data-led analysis and intelligence gained at anti-slavery partnership event and support early prevention and empower individuals to make informed decisions before entering employment, reinforcing Brightwork’s commitment to tackling modern slavery at every stage of the employment journey.

Key Performance Indicators (KPIs) & Risk Assessments

We apply a data-driven approach to measure effectiveness, using KPIs aligned to Find it, Fix it, Prevent it principles. These include reporting rates, investigation timeliness, audit outcomes, and preventative controls such as imposter detection. We use a combination of qualitative and quantitative indicators to assess risk exposure, measure performance, and inform continuous improvement.

We regularly review our policies, procedures, and operational practices through both internal and external risk assessments. These include structured gap analyses and external benchmarking, supported by our [advanced business partnership with Stronger Together](#), to ensure our controls remain proportionate to risk and aligned with recognised good practice.

Risk assessments are used to:

- Identify operational, sectoral, and workforce related modern slavery risks
- Prioritise mitigation activity and training
- Inform KPI design and performance monitoring
- Identify emerging trends and criminal typologies



This approach ensures our mitigation strategies remain relevant, targeted, and responsive to changing risk profiles.

Modern slavery and labour exploitation risks within our business model are driven by a combination of sector, workforce, and operational factors, including:

- High volume temporary labour models, which can increase worker dependency and reduce bargaining power
- Use of vulnerable labour pools, including migrant workers and individuals experiencing economic hardship
- Geographic dispersion of worksites, limiting daily oversight and increasing reliance on local management
- Complex labour supply chains, including the use of second tier labour partners in peak demand periods
- Criminal targeting of recruitment pathways, including the use of imposters, document fraud, and financial control

We recognise that these factors can be exploited by both opportunistic individuals and organised criminal networks seeking to profit from forced labour, debt bondage, and coercion. Therefore, these factors amongst others help shape our strategic approach to disrupting and identifying risk.

Investigation activity is treated as a leading indicator of awareness rather than failure, with insights used to strengthen controls and prevention strategies.

Business-Specific Performance Indicators:

Brightwork has established bespoke KPIs to monitor the effectiveness of our anti-modern slavery programme across the business. These indicators are reviewed regularly and inform both operational responses and strategic planning. They are listed in order of priority:

KPI	Improvements Made	Challenges	Target
Tracking of modern slavery reporting (Find it – Risk Identification)	Improved reporting of concerns from internal employees from 59% in 2024 to 73% in 2025.	Review of permanent staff training led to a full review of training materials. Focus for 2026 on increasing worker identification and reporting routes.	Maintain internal reporting rates and target of 5% of potential modern slavery/worker welfare/exploitation reports to originate from workers.
Case closure time (Fix it - Remedy & Response)	Tracking time from case identification to closure, including reporting to authorities, support, or other remedial actions. Average 18.5 days for all investigations in 2025.	We do not identify time from initial case to safeguarding actions as this is always the priority action. Also, the complexity of cases and identifying evidence to support concerns can be time consuming.	For 2026 >10% of welfare related cases to define time frame to involving support or remedial actions.
Increase Home Office reporting of Imposters. (Prevent it – Embedding knowledge)	Increase % of cases identified to the Home Office: 39% reported in 2024 71% reported in 2025	Our preventative measures are aiming to reduce the volume of imposters as they know we undertake strong due diligence at onboarding.	5% increase in reporting to Home Office.
Increase % of Internal audits returning a 'Strong' or 'Reasonable' outcome	100% of our Brightwork sites have returned a 'Strong' assurance rating	Be aware new clients are often not aligned to our standards initially and understandably require additional support.	Maintain 100% 'Strong' assurance rating.

These KPIs enable us to measure effectiveness, identify areas requiring intervention, and track improvements over time. For 2026 we will highlight where authorities have been engaged to track reporting closer and build on our existing KPIs.

High-Risk Sector Recognition and Mitigation

We acknowledge that some of our operations operate within inherently higher-risk sectors, including food processing/packaging, horticulture, and warehousing/logistics, and that elements of our diverse workforce particularly migrant labourers may face increased vulnerability.

To mitigate these risks, we have taken targeted action, including:

- Developed bespoke modern slavery training sessions for high-risk sectors and vulnerable demographic groups.
- Optimised our UK-based labour pool and removed any reliance on overseas labour agencies.
- Established enhanced due diligence and audit protocols should overseas labour sourcing resume, including supplier screening and audit triggers.
- Improved internal audits to include modern slavery awareness, support, and guidance.

This approach aligns risks assessment outcomes directly with operational controls and preventative action.

Proactive Identification, Reporting and Intelligence-led Prevention:

We recognise that investigation activity is a leading indicator of awareness and effectiveness, rather than failure. Brightwork acknowledges the inherent risk that our operations may be targeted by individuals and organised criminals seeking to exploit labour supply models.

Our systematic review of investigations over time has generated insight into emerging risks, informed training enhancements, and strengthened preventative controls (see below):

Year	Number of Investigations	Number of Potential Victims of Slavery
2019	41	33
2020	57	19
2021	68	76
2022	52	70
2023	40	103
2024	31	19 (+329 imposters)
2025	49	47 (+249 imposters)

2025 provided an opportunity to strengthen our approach through the development of key partnerships with anti-slavery organisations. We actively contributed to the Government's review of [Transparency in Supply Chain guidance in regards to Section 54 of the Modern Slavery Act 2015](#). This engagement prompted a review of our Modern Slavery Statement against the CCLA benchmarking framework and led to a refresh of our modern slavery training across the organisation.

We continued our robust diligence measures in preventing imposters entering our supply chain and saw a reduction in imposter attempts during the year. We also continued to report on individuals experiencing worker welfare concerns or potential exploitation, recognising that exploitation cannot be confirmed unless a case progresses to conviction. This approach reflects our commitment to transparency and early identification of risk.

These activities were built from key learnings in 2023 and 2024, when we first identified potential modern slavery risks within our Right to Work processes. This led to us strengthening our focus on prevention, resulting in fewer modern slavery-related investigations and the detection of 329 attempts across the Staffline Group, to enter the business using fraudulent identities. This work also led to enhanced collaboration with the Home Office through intelligence sharing and the provision of evidential support for 169 individuals, contributing to wider efforts to identify potential victims and prevent criminal exploitation.

Looking ahead to 2026, we will update risk reviews and undertake additional site visits to assess worker welfare and awareness of reporting mechanisms. We have improved our technological onboarding systems to support identification of imposters which strengthens our controls and enables earlier detection and prevention action.

	2022	2023	2024	2025	Commentary
Reports and Investigations into Modern Slavery and related concerns	52	40	31	49	Protect – Improved categorisation enables more appropriate worker support and earlier intervention.
Disclosures to authorities	28	37	135	150	Partner & Prosecute – Increased cooperation with law enforcement, civil actions, and investigations.
Imposters reported to the Home Office	Not Recorded	69	129	177	Prevent – Enhanced detection preventing exploitation entering operations.
Whistleblowing Reports	Not Recorded	9	27	21	Protect – Growing confidence in reporting culture and supporting us in ‘finding’ concerns.

Continuous Improvement - Actions & Progress:

Brightwork operates a structured improvement programme linking risk assessments, KPIs, and actions, ensuring findings translate into meaningful change.

Key achievements include:

- Improved workforce surveys with more accessible and relevant modern slavery questions, with escalation mechanisms if concerns are raised.
- Implementation of targeted onboarding assessments for higher-risk engagements.
- REC Compliance Assessment completed – 100% score.
- Completed a comprehensive review of all mandatory training for operational teams.
- SafeContractor accreditation.
- EcoVadis Bronze Award (rating Staffline in the top 35% of audited businesses).
- ISO 9001 (Quality Management System) and ISO 14001 (Environmental Management System) certification supporting governance and environmental management.
- Brightwork is factored into Staffline's SEDEX registration (membership number ZC1030669), with a completed Sedex Self-Assessment Questionnaire (SAQ), assessing site practices on labour, health & safety and more to identify and manage social risks. We currently have management controls score of 'Good.'
- Sedex Members Ethical Trade Audit (SMETA) 4-pillar completed in 2024 and operating on a 2-yearly renewal cycle.
- Ongoing provision of trend intelligence to the Home Office supporting national victim identification.

Brightwork embeds a rolling programme to cover due diligence, supplier engagement, training, reporting, policy review, and worker protection. This enables defined ongoing actions and future strategy including the development of a five-year modern slavery risk strategy.

The table below shows measures implemented by Brightwork in recent years and provides some commentary on the status of each measure and future or ongoing actions being progressed:

Measure	Commenced	Status	Concluded Actions	Ongoing Actions
Conduct due diligence checks to identify and assess potential modern slavery risks in our operations and supply chains.	2021	Ongoing	Hotspots targeted and addressed. Increased training, awareness and identifying imposters supports actions completed.	Stronger Together 360° Tool review a 5-year modern slavery strategy.
Take appropriate action to address any identified risks and work with our suppliers and partners to improve their practices.	2022	Ongoing	Labour suppliers reduced and audited with a full review completed of the audit process. Suppliers contacted to review practices and audit Modern Slavery commitments. Focus on using UK-based labour suppliers, preferably Fair Work Agency gangmaster licenced. Round table workshops have been delivered via SAMS and Staffline.	Review of second tier audits and due diligence planned for 2026-2027. Update our standard terms and conditions to include contractual commitments and codes of conduct.

Measure	Commenced	Status	Concluded Actions	Ongoing Actions
Provide training to our employees and suppliers to increase awareness of modern slavery and how to identify and report any potential cases.	2020	Annually & Ongoing	Achieve 100% completion of annual training for employees. Create and distribute materials to further knowledge of modern slavery and exploitation (such as our Red Flags material, and Anti-Slavery Day campaign materials). Create new targeted Modern Slavery training for new staff in addition to mandatory training. Initial roll out of targeted presentation tailored to stakeholder groups i.e. logistics, warehousing, geographical hotspots.	Create 2-minute talks on key areas. Deliver public newsletters including anti-slavery and regulatory updates
Support our customers and suppliers by sharing our experiences to help with their employee awareness and policy/ processes development.	2020	Ongoing	Developing and maintaining key relationships with customers is and will always be ongoing. Connected with third party vendors to discuss and review modern slavery awareness. Collaborative and educational round tables have been rolled out.	Continue round table/training session to raise awareness, share case studies, and build contacts within target hotspot areas.
Encourage and support the reporting of any suspected cases of modern slavery and human trafficking.	2021	Ongoing	Created control logs to monitor develop insights into investigations. Raising awareness and support to encourage reporting via training and educational tools has been evident in the number of internal cases reported* (2021=45%, 2022=60%, 2023=62%, 2024=59%, 2025=73%)	Continue to encourage and train staff and workers to raise reports for all suspicious activities. Identify why reporting dipped in 2024 and drive increases in reporting figures by promoting teamship and communication.

Measure	Commenced	Status	Concluded Actions	Ongoing Actions
Regularly review and monitor our policies and practices to ensure that they remain effective in preventing modern slavery and human trafficking.	2020	Ongoing	Quality Management System developed and implemented; ISO 9001 Standard achieved in 2023.	Ensure effectiveness and relevance of policies across the business and maintain the ISO 9001 Standard certification.
Protect our employees; against any human rights violations, their freedom of movement and association, against unfair recruitment practices and ensure they have access to internal and external grievance mechanisms.	2020	Ongoing	Developed the worker handbook and published in other languages to support accessing help and reporting mechanisms. Ensure adequate training is provided and campaigns are accessible. Attend hotspot areas with the support of customers to directly access workers to educate and inform of indicators and internal and external reporting mechanisms.	Continue engagement with the support of customers to directly access workers to educate and inform of indicators and internal and external reporting mechanisms. Attend government meetings to support shaping new legislation and policy.

** Internal reporting was for all case types (not always with a modern slavery element/focus) and is the percentage of all reports for the year (total number of reports vs internally reporting figures).*

Brightwork ensures all Scottish investigations are reported to the Board either as a direct escalation or via the monthly board report depending on prioritisation. All cases are reviewed by the Investigations Team and recommendations are proposed depending upon the case, these can be but are not limited to:

- Policy updates
- Onboarding controls
- Training (review, bespoke or targeted)

Additional recommendations can be proposed by senior management, and a closed loop is enacted to ensure any prevention outcomes are embedded. As a direct result of these measures, we improved our onboarding controls resulting in a reduction of exploitation cases with the correlation of preventing imposters entering our business; this has in turn identified higher risk demographics in certain geographical areas for us to increase support and has resulted in reports to the authorities of our concerns.

Collaboration and Communication

Brightwork communicates consistently with our suppliers, customers, and stakeholders to ensure awareness of our commitment to preventing modern slavery and human trafficking within recruitment and employment practices. Working collaboratively, we seek to identify, mitigate, and address risks, while sharing good practice and learning. Our experienced Compliance and Investigations Teams engage routinely with external HR and management teams to enhance awareness, identify appropriate support functions, and implement effective and proportionate processes.

We have a longstanding and constructive working relationship with the Gangmasters and Labour Abuse Authority (GLAA), which we are committed to maintaining and building upon with the launch of the UK Government's Fair Work Agency and other relevant enforcement authorities. Brightwork proactively and promptly report all suspected cases or indicators of modern slavery and labour exploitation. This intelligence-led approach has been recognised by authorities in several cases for the quality, timeliness and impact of the information and support provided to both enforcement partners and affected individuals.

As part of the Staffline Group, Brightwork's intelligence and reporting activity has contributed to:

- **Over 15 prosecutions in 2023**
- **19 prosecutions in 2024**
- **12 prosecutions in 2025** (the majority directly resulting from Staffline-led intelligence)

These outcomes demonstrate the effectiveness of our collaborative approach and our commitment to supporting enforcement action aimed at disrupting and preventing labour exploitation.

We work continuously to prevent unlicensed gangmasters from infiltrating our business and exploiting our workers. To support this objective, we regularly engage with authorities and specialist charities to tackle modern slavery, including Migrant Help, Hope for Justice, City Hearts, local councils, and local police teams. In addition, we actively participate in the 'Stronger Together' initiatives, maintaining our Advanced Business Partnership status and actively engaging with the 360° toolkit to ensure modern slavery remains a priority within ethical recruitment agendas and implementing their practical guidance throughout our organisation. Members of our Compliance Investigations Team and our Governance Director have completed advanced training in tackling modern slavery.

When potential victims are identified, we collaborate closely with enforcement authorities and charities to ensure a victim-centred approach, prioritising welfare, protection, and appropriate support. Since 2020, this collaborative approach has enabled us to support 50 survivors of modern slavery back into employment opportunities across our network. We have also conducted case reviews with the Police and the GLAA (now the Fair Work Agency), and where appropriate involve other labour suppliers and customers, this enables us to strengthen collective learning and improve future prevention and response.

Our compliance reporting, forms part of our broader due diligence framework and generates actionable intelligence that is shared, where appropriate, with relevant local and statutory authorities.

This intelligence includes recognised risk indicators of potential modern slavery and labour exploitation, such as illegal or overcrowded houses of multiple occupancy, the use of shared bank account details, and multiple individuals linked through common contact information.

This intelligence-led approach supports early identification and mitigation of modern slavery risks and contributes to the protection of worker welfare, enabling effective collaboration with authorities to help prevent exploitation and support the identification and disruption of those responsible.

We are proud of our partnerships with charities and specialist organisations including Refugee Sanctuary Scotland (RSS), Survivors of Human Trafficking in Scotland (SOHTIS) and Refugee Survival Trust. We support their work by providing reconditioned digital devices and work placements for survivors, helping individuals rebuild their lives and access sustainable employment opportunities.

Our involvement in anti-slavery networks continues to grow year on year, with increasing participation from organisations seeking to strengthen their response to modern slavery. Brightwork works closely with OnePay, an approved alternative payment solution for our workforce, to swiftly investigate any suspicions of modern slavery or fraudulent account usage and support any individuals who may have experienced financial control.

In 2024, we were proud to host six modern slavery-focused roundtable events, bringing together approximately 200 representatives from leading businesses. Building on this success, in 2025 we expanded our programme to nine events, engaging around 260 representatives. During this period, we also broadened our network of organisations committed to preventing exploitation, increasing our Corporate Partner community from 62 to 69 businesses.

Raising awareness among our clients and their supply chains remains a core focus, which is reflected in our leadership of the [Scotland Against Modern Slavery \(SAMS\)](#) initiative. SAMS is fully funded and jointly operated by Brightwork, part of Staffline, in partnership with Police Scotland, the Fair Work Agency, and the Scottish Government.

The core aims of SAMS is to:

- Raise awareness of exploitation risks within the Scottish business community and share best practice
- Support survivors of modern slavery into secure, good quality employment with corporate partners
- Deliver awareness activity within communities vulnerable to exploitation



Collaboration continues to be fundamental to fostering open communication, strengthening shared knowledge, and promoting effective, collective action. By working in partnership with authorities, businesses, and civil society, we continue to strengthen our ability to prevent modern slavery and to make a meaningful and lasting impact.

Case Study



In 2019, a 23-year-old man travelled to the UK seeking opportunities to work and explore. After securing employment in England, he worked for several months before his employer stopped paying him.

Following this, he was evicted from his accommodation and, when he approached his employer for help, was offered alternative work in Scotland at a dog kennel. With few options available to him, he agreed.

Upon arrival, it became clear that the site was in fact an illegal puppy farm. As the first COVID-19 lockdown was enforced, he became effectively trapped.

For approximately 18 months, he lived and slept in a room previously used to house dogs. During this time, he was forced to care for the animals, assist with breeding, and prepare puppies for online sale under exploitative conditions.

Eventually, he was rescued and recognised as a survivor of modern slavery. He was referred to Scotland Against Modern Slavery (SAMS) and Brightwork, where he began receiving structured support.

Initially, he was placed in temporary work within a distribution centre to help rebuild his confidence in a safe and supported environment. Both Brightwork and the host employer were aware of his experiences and worked together to ensure he received appropriate support as he re-entered the workplace.

Over time, his confidence and stability improved significantly. After several months, he felt ready to transition into a permanent role. A SAMS member organisation offered him full-time employment, supporting him through onboarding, site orientation, and team integration.

He went on to work successfully in this role for several years, securing stable accommodation and integrating into life and work in Scotland. Importantly, this stability enabled him to engage fully in the criminal justice process, contributing to the investigation and court case that ultimately led to the perpetrator being charged and convicted.

The survivor has since reflected that, without the support of SAMS and Brightwork, he likely would have fled Scotland and remained vulnerable to re-trafficking.

Governance and Oversight

Robust governance, effective oversight, and clear accountability are central to Brightwork's approach to identifying, preventing, and addressing modern slavery risks across our operations and supply chains.

Please see our [Corporate Governance Report here](#), hosted on parent company's website, Staffline Group PLC.

In 2023, Brightwork as part of Staffline implemented a comprehensive Quality Management System, achieving ISO 9001 certification, which evidences our commitment to consistent, well governed, and continuously improving management processes. In early 2025, we further strengthened our governance framework by attaining ISO 14001 certification for its Environmental Management System. Together, these management systems enable the systematic review, update, and strengthening of policies, procedures, and controls, supporting sustainable, ethical, and responsible business practices.

Our Governance Director provides strategic leadership for the anti-slavery framework, ensuring modern slavery considerations are embedded within strategic decision-making and day-to-day operations across the business. The Board of Directors maintains full oversight and a clear commitment to a zero-tolerance approach to modern slavery, which is clearly communicated throughout the organisation. Ethical behaviour is embedded in our core values, and we remain dedicated to upholding these standards throughout our operations.

Our policies and procedures are grounded in the principle of protecting worker welfare and are embedded within all operational processes and management arrangements. This comprehensive approach includes scheduled annual internal audits such as the Sedex Self-Assessment Questionnaire and Sedex four-pillar SMETA audits, complemented by unannounced external audits to identify, assess, and mitigate Modern Slavery risks within our operations and supply chain. Through robust due diligence processes, we thoroughly investigate any instances of potential Modern Slavery and implement corrective actions wherever necessary.

Investment in technology has strengthened our governance and oversight capability. Enhanced systems enable comprehensive checks across our databases and platforms, supporting the provision of prompt, accurate, and meaningful intelligence to enforcement authorities.

The use of structured data within reporting tools has increased automation and enabled the development of insight dashboards using management information software. These dashboards provide senior leaders with improved visibility of trends, risks, and investigation outcomes, allowing internal teams to focus more time and resource on investigations, follow up activity, and safeguarding actions. The value and impact of this data led approach continues to strengthen over time.

Internal audit protocols ensure that modern slavery information is clearly and prominently displayed across all offices and sites, supporting staff awareness and compliance with safeguarding policies and procedures. A centralised policy repository ensures all staff have access to current policies, while regular communications via multiple digital channels reinforce updates, expectations, and organisational principles.

Our approach to assurance includes:

Governance and oversight

- Central governance and compliance functions oversee the implementation of anti-slavery policies, maintain Fair Work Agency (FWA) licences where required, and coordinate annual modern slavery statements across trading divisions
- Board-level oversight and approval of the Modern Slavery Statement, with accountability embedded through ISO-aligned management systems (ISO 9001 and ISO 14001)

Data-led risk identification and checks

- Enhanced worker onboarding and Right to Work checks, supported by identity verification and document validation to reduce risks of exploitation, impersonation or coercion
- Ongoing monitoring of workforce and supply chain data to identify emerging risk indicators, including demographics, sector-specific risks and worker vulnerability factors

Monitoring, reporting and intelligence-led reviews

- Use of worker complaints, whistleblowing reports and operational intelligence to trigger focused reviews, investigations and mitigation actions
- Active reporting of identified modern slavery risk indicators to relevant authorities, with recognised contributions to government intelligence and guidance development

Compliance audits and assurance activity

- Scheduled annual internal audits and unannounced external audits to assess compliance with modern slavery policies and controls
- Targeted “deep-dives” on higher-risk sites, suppliers or labour models, informed by risk assessments and intelligence
- Business-wide modern slavery risk assessments and site-level checklists used to identify red flags, gaps and required remedial actions

Site visits and operational assurance

- Ad-hoc and planned site visits conducted by compliance teams to assess working conditions, recruitment practices and worker welfare arrangements
- Spot checks and on-site verification activities built into operational assurance processes

Worker and employee engagement

- Worker engagement and feedback mechanisms, including complaints routes and access to multilingual information on rights and protections
- Ongoing training and awareness programmes for employees and managers to support early identification and reporting of modern slavery risks

Transparency and continuous improvement

- Annual public reporting through the Modern Slavery Statement and the Staffline Group Sustainability Report, with continuous review and enhancement based on risk trends, audit findings and regulatory developments
- Use of recognised frameworks (e.g. CCLA Modern Slavery Benchmark) and internal assurance findings to drive continuous improvement plans

These are designed to identify, assess, and mitigate modern slavery risks within our operations and labour supply chains. Due diligence and investigation processes are applied consistently, with corrective actions implemented where risks or issues are identified.

Brightwork has submitted an annual modern slavery statement for more than ten consecutive years, with ongoing reviews and enhancement to reflect evolving risks, guidance, and learning. This demonstrates our long term commitment to transparency and accountability. We keep stakeholders informed of progress and areas for improvement through public reporting, including our [Sustainability Report](#) which highlights our wider impact on people, communities, and society. This reporting reflects our commitment to building a responsible, ethical, and socially conscious organisation.

Internal review processes drive continuous improvement, including regular updates to our Modern Slavery Statement and supporting policies, aligned to UK Government statutory guidance to cover six key reporting pillars. Our focus remains on implementing meaningful and effective change to strengthen prevention and response.

Our Investigations Team undertakes root cause analysis of cases and identifies learning opportunities, which inform improvements to controls, processes, and training across the business. Where appropriate we seek to remedy harm and support affected individuals, including signposting access to justice and compensation.



Policies

We maintain a comprehensive range of group-policies that set clear expectations for ethical conduct, worker protection, and responsible business practices. An overview of some of our policies is detailed below. All are assessed to evaluate their effectiveness and updated annually in line with our ISO 9001 (Quality Management System) commitments:

Policy Name	Overview
Group Whistle-blowing Policy	Provides clear mechanisms for raising concerns confidentially and without fear of retaliation. It outlines routes for reporting, escalation procedures, and the protections in place for whistleblowers, ensuring transparency, accountability, and early identification of risk.
Ethical Trading	Covers our responsibility to protect worker rights and to operate ethically and lawfully across our business and supply chains. This policy reinforces our expectations of suppliers and partners to uphold internationally recognised labour standards.
Preventing Hidden Labour Exploitation	Establishes an overarching commitment for all colleagues, in any role or capacity, to take a proactive approach to identifying and addressing indicators of exploitation. This policy supports awareness, vigilance, and intervention at all levels of the organisation.
No Child Labour	Brightwork operates a zero tolerance approach to child labour, as set out in the No Child Labour Policy, which confirms our commitment to lawful working age requirements and the protection of children from exploitation.
Tackling Modern Slavery and Hidden Labour Exploitation	Defines roles, responsibilities, and reporting requirements across the organisation. It outlines our approach to risk assessment, prevention, response, monitoring, and communication in relation to modern slavery and human trafficking, supporting a consistent and effective framework for managing risk.
Responsible Recruitment	Promotes ethical, fair, and transparent recruitment practices. It sets out responsibilities for employees and reinforces our commitment to ensuring workers are recruited freely and without coercion.
Eliminating Recruitment Costs	Provides clear assurance that work finding fees are prohibited. It defines remediation processes, reporting requirements, and responsibilities to ensure that no worker bears the cost of recruitment.
Worker Engagement and Substitution	Provides guidance on managing absences or substitutions, with specific safeguards to identify and address the risks of impersonation, coercion, or exploitation, including indicators of modern slavery.
Remediation	The commitment to review, remedy, and prevent adverse human rights impacts identified within our operations or supply chain. It defines escalation routes, responsibilities, and corrective actions to ensure issues are addressed effectively and sustainably.
Second Tier Supply	Clarification on expectations relating to indirect labour supply, including risk awareness, due diligence requirements, adherence to relevant authorities, and processes to be followed when engaging second tier suppliers.
CSR Statement	These policies are supported by our Corporate Social Responsibility Statement and are reviewed regularly to ensure they remain effective, proportionate, and aligned with emerging risks and regulatory expectations. Collectively, they form a core component of our due diligence framework and demonstrate our ongoing commitment to preventing modern slavery and protecting vulnerable workers.

We also request all suppliers align to our Code of Conduct or have existing codes or similar documentation to ensure alignment with our code.

Reporting Mechanisms

Any concerns for human rights issues, unethical behaviour including exploitation, worker welfare and modern slavery can be raised by any employee, contractor or agency worker to any line manager or the [dedicated investigations team](#) or anonymously via our independent provider [Safecall](#).

All concerns will be escalated and involve appropriate persons during investigations, then subsequently reviewed and reported to the Board of Directors through monthly board reports and case summaries.

Brightwork encourages any issues to be raised without retaliation and therefore provide multiple mechanisms through appropriate escalation methods within teams, surveys, welfare meetings, and anonymous routes.

Access to Remedy

Effective remedy is a core element of our response to modern slavery and labour exploitation. Where we identify actual or potential adverse human rights impacts linked to our operations or supply chains, we are committed to ensuring that the affected individuals are supported in a timely, fair, and victim-centred manner.

Our approach to remedy prioritises the safety, dignity, autonomy, and wellbeing of individuals, recognising that victims of modern slavery may be reluctant or unable to engage with formal processes. We therefore seek to remove barriers to support and ensure that remedies are accessible, appropriate, and responsive to individual circumstances. We support individuals to make an informed choice in any actions or support options, including the right to not engage with statutory processes.

Brightwork actively supports relocating employment opportunities, making suitable referrals to expert support services and authorities and we will support any operational remediation including ceasing engagement within our supply chain if necessary. Our remedial approach is proportionate, responsive, and focused on achieving meaningful outcomes for affected individuals rather than solely addressing compliance issues.

Safeguarding is a fundamental priority with immediate actions where appropriate to protect individuals from further harm and to consider any impact as a result of raising concerns so that no further negative consequences are experienced. We actively work with enforcement authorities, victim support organisations, and specialist charities to support individuals appropriately throughout their journey.

Every case is reviewed and presented to the board of directors to assess root-cause analysis and implement appropriate changes to reduce recurrence.

Spotlight on Best Practice

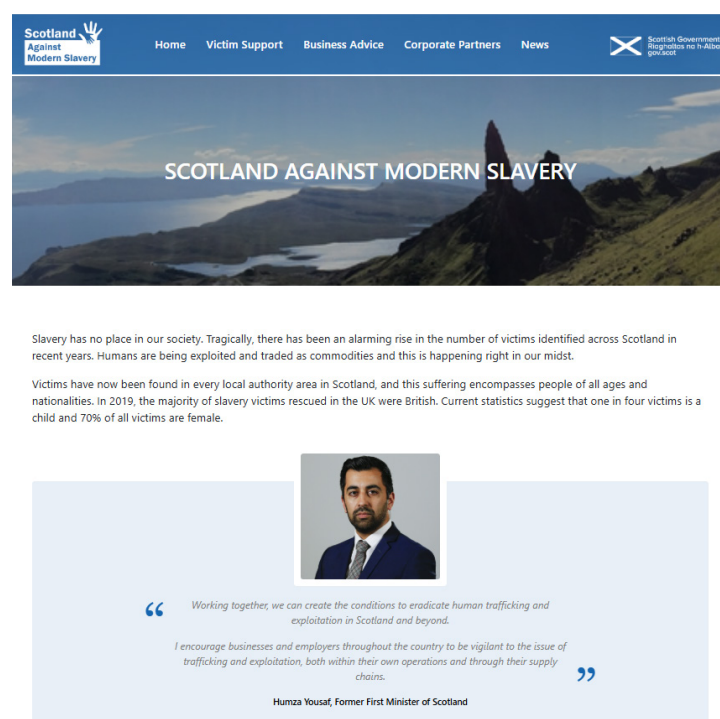
We conducted our initial modern slavery gap analysis in 2021; this has resulted in improvements and meaningful change across our operations. Building on this foundation, during 2025 we began reviewing our Modern Slavery gap analysis which will conclude in 2026; this will form a programme of work to be implemented over the course of the next five years as part of our longer-term strategy.

This refreshed gap analysis adopts a participatory and multi-stakeholder approach, with direct input from workers and engagement with key external stakeholders, including anti-slavery working groups such as MSIN and WMASN, Stronger Together, and the Association of Labour Providers (ALP). Input will also be sought from modern slavery charities, individuals with lived experience, and enforcement authorities, ensuring emerging risks, incentives, behaviours, and evolving criminal trends are fully considered. This approach supports a stronger understanding of risk and effectiveness, aligned with CCLA expectations.

Scotland Against Modern Slavery (SAMS) Initiative

Brightwork has grown to become Scotland's largest recruitment agency, providing over 4,500 workers each week across a wide range of industries. Brightwork is the sole supplier of temporary industrial labour to the three largest drinks producers in Scotland and also supports food production and logistics customers nationwide. This scale enables Brightwork to mobilise the largest temporary workforce in Scotland, placing it in a strong position to lead collaborative anti slavery efforts.

In 2017, Brightwork founded Scotland Against Modern Slavery (SAMS) to raise awareness of modern slavery within the Scottish business community. Today, SAMS works in partnership with the Scottish Government, Police Scotland, the Fair Work Agency (FWA), Migrant Help, alongside a wide range of NGOs, charities, and 69 corporate partners from across Scotland.



Slavery has no place in our society. Tragically, there has been an alarming rise in the number of victims identified across Scotland in recent years. Humans are being exploited and traded as commodities and this is happening right in our midst.

Victims have now been found in every local authority area in Scotland, and this suffering encompasses people of all ages and nationalities. In 2019, the majority of slavery victims rescued in the UK were British. Current statistics suggest that one in four victims is a child and 70% of all victims are female.

Humza Yousaf, Former First Minister of Scotland

Working together, we can create the conditions to eradicate human trafficking and exploitation in Scotland and beyond.

I encourage businesses and employers throughout the country to be vigilant to the issue of trafficking and exploitation, both within their own operations and through their supply chains.

The Human Trafficking and Exploitation (Scotland) Act 2015 provides key legislative grounding, and through SAMS, Brightwork collaborates closely with the Scottish Government's Human Trafficking Team to ensure businesses across Scotland understand their responsibilities and remain alert to exploitation risks. Working with Migrant Help, Refugee Sanctuary Scotland (RSS), and Survivors of Human Trafficking in Scotland (SOHTIS), Brightwork has committed to supporting survivors by helping them access sustainable employment through client and community relationships. Brightwork Director Shan Saba also serves as a Trustee of the Refugee Survival Trust, which provides practical support to refugees and people seeking asylum and campaigns for systemic change.

Many service users supported by RSS are not yet eligible to work in the UK while navigating the Home Office asylum process. During this time, workplace skills may deteriorate, and individuals may become increasingly vulnerable to exploitation. In response, SAMS delivers educational workshops on behalf of the Trust, supporting individuals to become 'work ready,' recognise exploitation risks, understand what constitutes good work, and identify responsible employers.

During 2026, the SAMS movement enters its tenth year, with all corporate partners committed to eradicating modern slavery by:

- sharing intelligence and best practice,
- supporting victims into sustainable employment, and
- raising awareness across their organisations and wider supply chains

Each corporate partner appoints a SAMS ambassador, responsible for leading activity within their organisation, supporting delivery of the Scottish Government's Trafficking and Exploitation Strategy, embedding best practice, and raising awareness among stakeholders and peer businesses.

SAMS also hosts monthly roundtable events, supported by regular podcasts delivered through Brightwork. These feature expert guests including the Former Independent Anti Slavery Commissioner, the First Minister for Scotland, and a Former UK Prime Minister. The round tables and podcasts focus on emerging perpetrator trends, live case examples, government activity, supply chain risk considerations, and the sharing of effective business led prevention strategies.

The Scottish Government's Trafficking and Exploitation Strategy Annual Progress Report has highlighted Brightwork's contribution through SAMS, recognising its role in raising awareness, sharing best practice, and supporting victims. This acknowledgement confirms SAMS as an integral component of the Scottish Government's future strategy to tackle modern slavery and human trafficking.

For further information on SAMS, [visit their website](#) or [contact Brightwork](#) if you would like further information.



Case Study



In early 2025, potential exploitation risks were identified during a pre employment process when an individual attended a workplace induction accompanied by others who were not expected or booked to attend. Colleagues observed behaviours that raised concern, including attempts by the accompanying individual to speak on behalf of others and manage interactions with staff.

Applying internal guidance and modern slavery risk indicators, staff noted that the individuals appeared anxious, had limited awareness of their personal circumstances, and were unable to independently confirm basic information required for pre-employment checks. In line with established procedures, the process was paused and the individuals were advised that they would need to return at a later date following the correct onboarding steps.

Subsequent engagement identified similar indicators affecting a further individual. The matter was escalated through internal reporting channels to the investigations team, recognising potential links between the incidents and the risk of coercion or control.

A review was conducted in collaboration with relevant statutory partners. As a precautionary measure, and to prioritise individual welfare, a coordinated safe and well check was undertaken. The individuals were spoken to independently and offered appropriate support. Partner agencies confirmed that no indicators of modern slavery or labour exploitation were identified at that time.

This case demonstrates the effectiveness of staff training, clear escalation routes, and partnership working in identifying and responding to potential risks at an early stage. It also reinforces our commitment to prioritising worker welfare, even where concerns are ultimately not substantiated, and to using intelligence-led approaches to prevent harm.

Future Plans

Brightwork is committed to strengthening our efforts to prevent modern slavery and human trafficking. We recognise the complexity and sophistication of these crimes, which require ongoing vigilance and comprehensive safeguards to protect our workforce and business. Implementing robust measures to counteract exploitation is a top priority for us.

Education and awareness remain key to our strategy, and we are dedicated to empowering our employees and stakeholders to identify and report any signs of exploitative practices. We continuously engage with our workforce, ensuring they feel confident and supported in raising concerns across all areas of our operations with plans to launch an advanced training course for frontline operational staff in higher-risk areas. In 2019, we launched our campaign to encourage workers to know their rights and understand what to expect from working in the UK. This ongoing initiative has strengthened every year, and it continues to increase awareness across our workers, fostering a culture that supports individuals to feel empowered to report any exploitative practices either experienced personally or witnessed.

At Brightwork, we also place high importance on our role in supporting local communities and protecting the environment. Our overarching strategy is outlined in our annual [Sustainability Report](#).

For Brightwork, our Environmental, Social, and Governance (ESG) commitments are not just a compliance exercise; they are integral to our corporate and governance strategies, which include our unwavering commitment to addressing modern slavery and hidden labour exploitation within our own business and throughout our partnerships. Our Sustainability Committee, with its deep understanding of the Group and its subsidiaries, ensures that our strategy aligns with our broader business goals and remains relevant within our industry.

Brightwork will continue to assess our risks and transparency throughout our business to identify and establish a company-wide compliant approach to Modern Slavery management. Based on risk assessments, intelligence analysis, and investigation trends, Brightwork has identified the following priority risk areas for 2026-2027 will continue to incorporate and build on the following:

Risk Area	Why This Matters	Our Risk Response
Labour exploitation in temporary roles	High dependency and low job security	Enhanced onboarding checks, welfare engagement, worker voice mechanisms
Imposters and identity manipulation	Infiltration of labour supply enabling exploitation	Digital onboarding controls, intelligence led matching, and reporting
Second tier labour provision	Reduced visibility beyond Tier 1	Supplier reduction strategy, enhanced due diligence and comprehensive audit arrangements
Financial control of workers	Indicator of coercion and debt bondage	Alternative payment solutions, financial pattern monitoring, early escalation
Under reporting by workers	Fear, lack of awareness, cultural barriers	Multilingual materials, anonymous reporting, targeted awareness campaigns

Summary

Modern slavery and trafficking are multifaceted global problems and, with the links to many criminal organisations, it remains high-risk to any supply chain or business.

Brightwork will continue its investment in the identification and prevention of modern slavery; it remains a high priority for the business and that of our valued customers.

We remain fully committed to compliance and high levels of ethical standards and strive to do more to help rescue potential future victims of modern slavery.

Whilst we have established well-tested, successful processes embedded in Brightwork, we will continually review and strengthen using knowledge learned and intelligence shared.

We are reassured that the scale of our business can be extremely helpful to link with our partners outside of our industry to help tackle modern slavery and raise awareness across all regions of the UK, and we welcome all partnerships and will always do what we can to help protect workers from this horrific crime.

Keeping the communication channels open to encourage our workers to approach us any time to have the confidence to report exploitation and using our internal learning platforms, our ISO 9001 certified Quality Management System, and our SharePoint tools to help escalate messages throughout our business to keep the conversations flowing will be key to engage more internally.

Brightwork will continue to assess our risks and transparency throughout our business to identify and establish a company-wide compliant approach to modern slavery management.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Brightwork and its relevant subsidiaries to prevent modern slavery and human trafficking in our operations and supply chains.

This statement was approved by the Governance Director of Staffline Recruitment Limited, and the Managing Director of Brightwork Limited in May 2026 and is published on the Brightwork website. A copy of this statement has been submitted to the UK Government Modern Slavery Statement Registry.



Steven Aston-Bell
Governance Director
Staffline Recruitment Ltd



Julie Burnside
Managing Director
Brightwork Ltd

