

MODERN SLAVERY POLICY

Real People. Real Feelings. Real Innovation.

This is the MSP GURU LTD (“Company”) statement made pursuant to Section 54 of the UK Modern Slavery Act 2015 for the financial year ending December 31, 2020.

Company is a global advisory service for the recruitment industry, headquartered in the United Kingdom and the United States.

The Company outsources various legal and accounting tasks to partner firms in the United Kingdom and the United States.

Business Partners Code of Conduct

Company abides by our policies and requires all suppliers to agree to our *Business Partner Code of Conduct*, which includes abiding by our Labour Standards – Freely Chosen Employment, Child Labour Avoidance, Lawful Employment, Non-Discrimination or Harassment, Freedom of Association, Safe Conditions, Working Hours, and Wage and Benefits. These are summarized below.

Freely Chosen Employment

Employment with Company and its business partners should be an expression of free choice, and there should be no forced, bonded or involuntary labour. Company and its business partners should allow workers to discontinue employment upon reasonable notice. Company and its business partners should not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits unless such actions are required by law.

Child Labour Avoidance

Company and its business partners should not use child labour, and Company and its business partners should adopt procedures to verify and maintain documentation that no workers are younger than the local legal age for completing compulsory education. Company and its business partners must follow all applicable local laws, regulations and standards concerning working hours and conditions for all workers. The term “child” refers to any person employed under the age of 15 (or 14 where the law of the country permits), or underage for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

Lawful Employment

Company and its business partners must, before employing any worker, validate and review all relevant documentation to ensure that such worker has the legal right to work.

Non-Discrimination or Harassment

Company and its business partners must not discriminate because of race, colour, gender, gender identity or expression, sexual orientation, age, religion, disability, marital status, veteran status, national origin, citizenship, or cultural, religious or personal beliefs.

Freedom of Association

Company and its business partners must respect the legal rights of employees to join or to refrain from joining worker organizations, including trade unions. Company and its business partners have the right to establish favourable employment conditions and to maintain effective employee communication programs as a means of promoting positive employee relations that make employees view third-party representation as unnecessary.

Safe Conditions

Company and its business partners must provide a safe and hygienic working environment for workers and provide appropriate safety equipment and training.

Working Hours

Company and its business partners must afford workers working hours that comply with applicable laws.

Wage and Benefits

Company and its business partners must provide wages, benefits and overtime pay that comply with all local wage and hour laws and regulations including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.

Training

Company and its business partners require all internal employees to follow a Code of Business Conduct and attend training. They receive a certification of completion at the end of the training that confirms they understand the policy.

David Ballew
President & CEO