

HIBERNIA KENYA TALENT

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Modern Slavery Statement

Hibernia Kenya Talent ("HKT") is committed to preventing slavery and human trafficking in all aspects of our global recruitment operations. We adhere to the highest ethical standards and maintain clear guidelines to ensure our business and supply chains remain free from exploitative labor practices. While recruitment companies in Ireland are not currently mandated by domestic law to publish a standalone statement, we issue this in alignment with the UK Modern Slavery Act 2015 and in accordance with our own internal corporate governance and the requirements of our HSE and private healthcare partners.

1. Group Structure and Business Model

HKT is a Dublin-based strategic healthcare sourcing partner. Our core business is the "Clinical Bridge" framework, which facilitates the ethical, merit-based selection and integration of elite Kenyan clinical talent—including nurses and allied health professionals—into Irish HSE and private healthcare frameworks.

Our operations are defined by:

- **Primary Sourcing:** Direct sourcing from Kenyan clinical environments.
- **Rigorous Vetting:** Exhaustive primary-source validation of clinical credentials, professional status (NMBI/CORU), and academic standing.
- **Supply Chain Scope:** Our supply chain primarily involves international clinical partners, Irish institutional framework partners, background screening agencies, and relocation infrastructure providers.

2. Core Anti-Slavery Policies

HKT maintains a zero-tolerance policy regarding forced labor, servitude, and human trafficking.

- **Zero-Fee Governance:** We operate under a strict zero-fee policy. We believe that charging candidates for placement services is a fundamental driver of debt bondage and exploitation; therefore, we never charge candidates for our sourcing, vetting, or recruitment services.
- **Code of Conduct:** All HKT consultants are governed by a strict Code of Conduct that mandates ethical interaction with candidates and transparent dealings with institutional clients.

- **Whistleblowing Framework:** We provide safe and confidential channels for candidates, employees, and clients to report any concerns regarding exploitative behavior or breaches of our ethical standards.

3. Recruitment Due Diligence Processes

Our "Clinical Bridge" framework acts as our primary defense against modern slavery. We employ the following mandatory controls:

- **Right to Work Verification:** We conduct robust verification of all legal documentation, including passports and appropriate entry visas, before any candidate is presented to an Irish client.
- **Direct Bank Payments:** We ensure all employment contracts facilitated through our partners mandate direct salary payments into the worker's own bank account, preventing third-party financial control.
- **Transparent Contracting:** We ensure candidates are provided with clear, accessible employment contracts that detail terms, termination rights, and working conditions in compliance with Irish Employment Law.

4. High-Risk Areas and Mitigation

International healthcare recruitment involves inherent risks of exploitation, particularly regarding recruitment fees and the restriction of candidate movement. HKT mitigates these risks through:

- **Institutional Audits:** We perform exhaustive regulatory due diligence on all clinical partners to ensure they meet international standards.
- **Client Terms:** We incorporate explicit anti-slavery and ethical-recruitment clauses into all Terms of Business with our Irish healthcare clients, ensuring that our downstream partners share our commitment to candidate welfare.
- **Merit-Based Selection:** All appointments are strictly merit-based, ensuring that candidates are chosen for their clinical competence rather than their ability to pay or provide kickbacks.

5. Training and Effectiveness

- **Staff Education:** Our multidisciplinary team of compliance and vetting specialists undergoes mandatory annual training to identify "red flags" associated with human trafficking, such as coerced documentation, falsified credentials, or restricted movement.
- **Effectiveness Monitoring:** We track internal KPIs, including the number of candidates successfully vetted through our primary-source validation matrices and the completeness of our regulatory audit trails.
- **Review:** This statement will be reviewed and updated annually to reflect changes in our operational environment and evolving standards in international ethical recruitment.

Approved by the Sourcing Director



Walter Kiptoo

Sourcing Director

Hibernia Kenya Talent

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