



# Modern Slavery Act Compliance Statement

This statement has been published in line with the requirements of the Modern Slavery Act 2015 and sets out the Company's position on the prevention of modern slavery and human trafficking for the year ending December 2020. It was approved by the Board of Directors in June 2021, being signed off by our Commercial Director, Damian Whitham.

Experis Limited takes the issue of modern slavery very seriously with a zero-tolerance approach to the subject with continual review by the Board and our Operational teams. We work with our clients and registered work seekers as part of our attempts to expose any incidents of modern slavery in the workplace. Our efforts have continued throughout 2020 and we are pleased to report that no incidents were identified in the last year. We are in support of the Act and will not knowingly work with any businesses found to be involved in modern slavery.

## Our Business

Experis Limited is a company operating as both an employment agency and business in the UK. We are a subsidiary of ManpowerGroup Inc.

Experis are widely recognised as a leader in the supply of specialist IT Professional Resourcing (interim and permanent talent) and IT Solutions (project/SOW-based services and managed services). Over the last 30 years in the UK specifically, we have worked hard to build our reputation in the market place, positioning ourselves as a key provider of digital and emerging technologies skillsets; evolving our infrastructure, people and process to support our clients to respond at pace to this ever-changing landscape. We have successfully delivered the fulfilment of requirements for 600 private and public sector clients on a local and national level covering all geographies and industries. We have placed more than 8,000 candidates in IT roles with more than 20% of these in highly skilled digital roles; we have provided solutions ranging from one-off specialist placements to large scale projects of more than 1,500 contractors.

Technology fuelled business transformation is re-shaping the IT landscape. This rapid evolution is creating the need for workforce strategies that address growing talent gaps, to fully realize the value and efficiencies resulting from digital transformation. Amid growing talent shortages, organisations need to access and create expertise to support the implementation of new technologies and processes that can scale quickly across their permanent and interim talent pools.

For organisations who want an agile, flexible way to manage IT talent, Experis empowers clients across the full lifecycle of technology adoption, providing flexible solutions that adapt to the needs of the organisation as technologies and skills evolve. By leveraging our capabilities in talent and skill development we tailor solutions to meet changing workforce needs today and for tomorrow. Our solutions focus on the following practice areas: Business Transformation, Cyber Security, Digital Workspaces, Cloud and Infrastructure Services, and Enterprise Applications.

## Our Policies

Experis policies are established by our Board of Directors, based on advice from HR professionals, industry best practice and legal advice. We review our policies on a regular basis, and as needed, to adapt to changes.

As a company we have the following relevant policies in place:

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- **Modern Slavery and Human Trafficking Policy** sets out our zero-tolerance approach to modern slavery and our commitment to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains
- **Ethical Purchasing Policy** stipulates the conditions under which the Company will conduct its business in respect of the procurement of all externally supplied goods and services and requires our supply chain to provide positive assurance towards, including but not limited to, zero tolerance on human trafficking and use of any form of forced or compulsory labour and freedom of employees
- **Code of Business Conduct and Ethics** promotes honest and ethical conduct throughout the Company, as well as provides a mechanism to report unethical conduct via the Ethics Hotline to help preserve our culture of honesty and accountability and is part of our annual update training undertaken by all employees
- **Corporate Social Responsibility Policy** reflects our commitment to support socially productive activities to make our world a better place. What we do helps to change lives and communities for the better. Experis provides people with training and job opportunities that help them to transform their lives, and this puts social responsibility at our core
- **Whistleblowing Policy** sets out our position on whistleblowing and encourages the reporting of any legal or regulatory violations or any failure to comply with internal regulations, ethical standards and legislation
- **Supply Corporate Responsibility Policy** details our expectation of suppliers to adhere to our ethical and social standards including minimum labour standards
- **Fair Labour Practices** – worker questionnaire (completed anonymously)
- **Environmental, Social and Corporate Governance (ESG)** – Working to Change the World is an evolution of our previous Sustainability Plan and Pillars to encompass broader ESG priorities and align with common industry metrics, centring around three key themes, one of which being 'People & Prosperity'. Our approach reflects both the World Economic Forum's International Business Council Stakeholder Capitalism Metrics and our focus on prioritising the five UN Sustainable Development Goals where we can deliver the greatest impact.

These policies are available to all employees on the Company intranet and are first introduced as part of their initial on-boarding induction when joining the Company. Adherence to our policies is expected of all employees.

Any employee who breaches our policy on Modern Slavery and Human Trafficking Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they do not meet our corporate expectations.

We review our policies and procedures on a regular basis and as legislation may dictate to ensure not only ongoing compliance to our standards but also that our supply chain shares the same principles and commitment to the Modern Slavery Act.

## Our Processes for Managing Risk

Our standard practices are designed to protect and promote human rights and fair labour practices throughout the recruitment, selection and employment of both our employees and the work-seekers we place with our clients. Experis Limited operates within all applicable recruitment legislation.

During 2021:

- All existing employees have completed refresher ethical, including modern slavery training annually, part of which includes the Modern Slavery policy
- All employees have been advised on how they can report any concerns they may have associated with Modern Slavery
- Our Compliance team carried out remote audits of our Experis network. These audits included

establishing as an employer, we comply to the Proof of Right To Work rules governed by the Immigration, Asylum and Nationality Act 2006 legislation, undertaking of the right checks at the right time, to establish an individual's entitlement to work. This includes the completion of follow up checks for those employees who have limited permission to be in the UK to ensure we do not employ an individual who is not permitted to work, proof of history/references and qualifications (as required) for all our workers

- Our Payroll Department carried out regular checks on our workers bank details to identify where individuals may be sharing bank accounts, or addresses, as this could be an indication of illegal behaviour
- All workers have on-line access to their weekly pay records allowing them to view all deductions we legally make from their salaries.

## Due Diligence

A commitment to human rights, fair labour practices and ethical business dealings is essential to our principle-based culture.

Experis Limited:

- is a member of the Recruitment and Employment Confederation (REC) and has representation on their Employment Policies Committee
- has held a corporate Gangmasters Licence since the inception of the Gangmasters and Labour Abuse Authority (GLAA), formally known as the GLA, which was formed as an independent body arising out of the Gangmasters (Licensing) Act 2004. Its Mission Statement is to work in partnership to protect vulnerable and exploited workers
- is part of the group of organisations that founded JobsAware a brand of SAFERjobs (Safe Advice for Employment and Recruitment). This is a non-profit organisation which started out as a Metropolitan Police Fraud Forum within Operation Sterling in 2008 and their aim is protect and advance worker rights in the UK, in three important ways:
  - Ensuring all workers and work-seekers in the UK have access to free help and advice
  - Working with employers and recruitment businesses to help prevent job scams and labour market abuses
  - Bringing the voices of workers and businesses to UK Gov, to help inform labour market policy.JobsAware works with the Metropolitan Police, Business, Energy & Industrial Strategy (BEIS), Department for Work and Pensions (DWP), Trading Standards, Crown Commercial Service, Disclosure & Barring Service, Disclosure Scotland, recruitment industry trade associations and private sector recruitment businesses
- seeks positive assurance, within our UK supply chain, that they agree to comply with the principles of our Corporate Social Responsibilities Policy, which forms part of the contract with our supply chain. Where appropriate, we carry out due diligence on prospective suppliers, as well as auditing existing and prospective suppliers about legal and contractual compliance
- takes a risk-based approach to addressing concerns that may arise from our supply chain. Modern Slavery considerations are included as part of our risk management and supplier selection processes. We also review how we align with our suppliers on this issue. We expect all suppliers to operate in accordance with our Supply Chain Business Partner Policy. We procure that our supply chain disseminates these terms down to their own suppliers and subcontractors.

## Our Performance

**World's Most Ethical Companies 2021** - Ethisphere has recognised ManpowerGroup for the twelfth year as a World's Most Ethical Company for its proven commitment to ethical leadership, compliance, corporate social responsibility, and business practices at large. We are the only company in our industry to earn this award.

**Glass Lewis/Sustainalytics ESG Rating 2021** - ManpowerGroup's performance in environment, social, and governance (ECGESG) has been recognised by Glass Lewis & Sustainalytics. We're proud to be leading in our industry in ESG – as well as being in the 2nd percentile of All Companies (94 of 13,676), 4th percentile in Commercial Services (13 of 380) and, 1st percentile in HR Services subindustry (#1 out of 57).

We are committed to ensuring there is transparency in our own business and in our approach to tackling unethical business practices, including modern slavery, throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

There haven't been any breaches of the Modern Slavery Act reported during 2021. Moving forward we will look to include specific KPI's to measure our success.

## Training

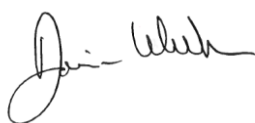
Our **Code of Business Conduct and Ethics** provides guidance to all our staff on the conduct of our business according to the highest moral standards. The Code and our other ethics policies help to focus our staff on the areas of this type of risk. It offers guidance in recognising and dealing with any ethical issues and provides mechanisms to report unethical conduct without fear of retaliation.

The code provides a compliance hotline for employees to inform (on an anonymous basis) any concerns with activities of the Company or the supply chain. This can be found on the company's intranet.

All staff are required to complete the **Business Conduct and Ethics training and certification** annually to build their training and knowledge on the subject.

Additionally, where we have supply arrangements in a sector where the use of modern slavery practices have been evidenced, we have introduced further training for the recruitment teams involved.

Signature:



**Damian Whitham**  
Commercial Director

Date: 30 May 2022