

# Slavery and Human Trafficking Statement

**This statement reflects our zero-tolerance approach to slavery and human trafficking and sets out the systems and controls that we have in place to ensure that slavery is not taking place within our business or in our supply chain.**

This statement is made on behalf of all companies and brands within The SR Group, pursuant to section 54(1) of the UK's Modern Slavery Act 2015, and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2022.

## Our group structure

The SR Group is a global specialist recruitment organisation, headquartered in the UK, which focuses on Legal, Risk, Compliance, HR, Tax, Treasury, Marketing and Executive Search disciplines trading under the names Brewer Morris, Carter Murray, Frazer Jones and Taylor Root. The SR Group (which means our subsidiaries, our ultimate holding company and its subsidiaries) employs around 450 employees out of 14 offices worldwide and has a global turnover in excess of £88,500,000

### Our policies

Internally, we engage with our employees on a professional and respectful basis and have established contractual employment practices clearly outlining their rights under UK legislation.

All employees are paid above national minimum wage and have access to a suite of benefits including pension and private healthcare.

Our employees are protected by internal policies, including anti-slavery and human trafficking, formal grievance, code of conduct, equality and diversity, anti-harassment and whistleblowing policies, which provide both protection and a voice in challenging malpractice within the group.

Our employees are expected to raise any concerns about any issue or suspicion of slavery in our business or supply chain at the earliest possible stage. They should do so by contacting our divisional Partner group, HR Director or CEO who will then investigate and take any necessary action.

Any reported breach of this statement by our employees will be investigated and may lead to disciplinary action which subsequently could result in employee dismissal.

### Our supply chain

We have good visibility and a close relationship with our global supply chain, which comprises organisations who supply goods and services to The SR Group.

All suppliers to The SR Group are expected to meet our high professional standards and ensure compliance with all applicable legislation, including the Modern Slavery Act 2015.

All staff involved in the engagement of suppliers must communicate our zero-tolerance approach to all prospective suppliers at the outset of our business relationship.

Our Legal Team and/or Client Services Team review Supplier contracts and seek to include express obligations in all contracts which, if breached, may result in the termination of our relationship with the Supplier.

We will not work with any Supplier who has been found to have been involved in slavery or human trafficking

## Our due diligence process

We have a Supplier Due Diligence process including a Supplier Checklist and a Supplier Code of Conduct which, amongst other things, communicate our high ethical standards and expectations to Suppliers along with our zero-tolerance approach to slavery.

On review of Supplier contracts, our Legal Team/Contract Review Team also assess any areas of risk. The contract is carefully reviewed and if material risks are identified, where appropriate, further measures are put in place or we would refuse to engage with that Supplier. Where we identify significant risks that cannot be mitigated, the risks are escalated to the senior management team for approval.

We take the supply of interim and permanent personnel seriously as it is the professional service we provide as a business and our Client Services Team carefully reviews all contractual terms between our company and our Clients. This helps to ensure that particularly our interim candidates will be working in a safe, professional environment and that their working hours will be monitored by way of a formal timesheet process. We always gain confirmation from our interim and permanent candidates that they wish to be submitted for consideration on a role.

We meet with prospective candidates in person or via video call (wherever reasonably possible) and carry out a number of checks on prospective employees and candidates (whether they are to be placed with clients or for our own internal recruitment purposes) as part of our due diligence processes. Depending on the nature of the relationship or engagement, we:

- conduct Right to Work and reference checks on our employees and candidates in appropriate circumstances;
- check that temporary workers who we payroll have their own bank account into which they can be paid and receive pay that is compliant with the relevant legislation in the applicable jurisdiction (including but not limited to The Agency Workers Regulations 2010);
- engage temporary workers via a formal contract which is compliant with relevant legislation in the applicable jurisdiction (including but not limited to the Conduct of Employment Agencies and Employment Businesses Regulations 2003 and The Agency Workers Regulations 2010 in the UK); and
- comprehensively vet and audit umbrella companies to ensure that those on our preferred supplier list comply with all relevant laws in the applicable jurisdiction relating to employment and taxation

## Our risk assessment

Overall, we consider that the nature of the recruitment services that we provide, and the sectors within which we operate, mean that our risk of slavery is lower than in other sectors. However, our Board will continue to monitor the risk and revisit this assessment on a yearly basis.

## Our training for staff

We understand the importance of training employees to enable them to be able to identify slavery and we therefore provide annual training for our employees on modern slavery legislation to further enhance their understanding of this area and their ability to identify signs of slavery and raise concerns.

## Measuring effectiveness

We are committed to adopting best practice and will continue to monitor the effectiveness of our controls and systems and to make improvements and enhancements wherever possible.

This Statement was approved by the Board of Directors on **25 March 2022**.



David Buckley  
Chief Executive Officer, March 2023