



MODERN SLAVERY STATEMENT

Introduction from Steve Ingham, Chief Executive Officer, PageGroup plc

PageGroup's purpose is to change lives for people through creating opportunity to reach potential. We are therefore fully committed to preventing acts of modern slavery and human trafficking from occurring within our business and the supply chain.

Our Employee and Supplier Codes of Conduct [[links](#)] make clear that we expect our own people and everyone employed by our suppliers, whether permanent or temporary, to be treated with respect and dignity at work and we believe employment should always be chosen. There must be no forced, bonded or involuntary labour. Employees must not be required to lodge monies or identity papers to be able to work and must be free to leave employment after the giving of reasonable notice.

We are publishing this statement to explain the actions we have taken to mitigate modern slavery within our supply chain and the steps we intend to take over the coming year.

Steve Ingham

Chief Executive Officer

31 May 2022

PageGroup Structure

We are a global specialist recruitment consultancy. Our parent company is PageGroup plc, the PageGroup group of companies trade under the core brands of PAGEGROUP, PAGE EXECUTIVE, MICHAEL PAGE, PAGE PERSONNEL and PAGE OUTSOURCING (together the "Group"). The Group delivers permanent and temporary recruitment services and solutions, has c. 7,500 employees worldwide, operates in 37 countries and has a global annual revenue of c.£1.6bn. The Group is organised into four regions: Europe, Middle East and Africa; the UK; Asia Pacific; and the Americas. To find out more about the nature of our business please click [here](#).

Our Supply Chain

As a provider of recruitment services, we consider our supply chain to be relatively simple in comparison to many other industries.

In the UK, and across the world, we aim to work with a small range of suppliers who provide services across a number of different categories, such as property and facilities management, IT and telecoms, marketing, legal and other services. Therefore, we have close relationships with our suppliers and good visibility of our supply chain.

Risk and Compliance

PageGroup has evaluated the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain. As our core business is focused on the provision of recruitment services in respect of professionals, office and administrative workers (rather than in relation to agriculture, retail or manufacturing, which are sectors we perceive to present a higher risk of labour exploitation and modern slavery), we do not consider that we operate in a particularly high-risk sector. That said, when appraising our supply chain, a risk based approach has been developed, focussing on:

- a) **products we buy** that are imported from countries identified as having a high risk of modern slavery; and
- b) **services we consume** across industries where modern slavery is typically more prevalent.

In terms of the products we buy, the Group has referred to the Global Slavery Index's list of products with identified risk of forced labour by source countries¹. The only risk area identified relevant to PageGroup was in relation to Electronics - Laptops, computers and mobile phones. PageGroup, like with many other corporate organisations, consumes products in these areas from globally recognised firms who we require to have established modern slavery policies and practices in place, and we will continue to monitor their activities.

In terms of the services we consume, our risk assessments have determined that cleaning and recycling/waste disposal services represents the only service line which carries a higher risk of modern slavery.

This evaluation process across both categories continues on an annual basis.

¹ <https://www.globalsslaveryindex.org/>

Our Policy on Modern Slavery and Human Trafficking

Our employees are required to comply with our Employee Code of Conduct and our suppliers with our Supplier Code of Conduct.

These policies reflect our commitment to acting ethically and with integrity in our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our business and UK supply chain.

We have additional measures in place to ensure that slavery does not occur in the supply chains of our non-UK businesses (see below).

Due Diligence Processes for Slavery and Human Trafficking

Our Own Business

PageGroup prohibits the use of all forms of forced labour and any form of human trafficking as set out in the Employee Code of Conduct [\[insert link\]](#). We have a number of procedures in place in relation to our employees to proactively manage any risk, including robust recruitment processes in line with employment laws and a confidential third party operated “Speak-Up” helpline operating across our worldwide business which employees and third party workers are encouraged to use to report any concerns.

As part of our own business, we supply temporary personnel to a number of clients. We take our obligations seriously in this respect and have well established and audited procedures to ensure that those temporary workers are protected from the risks of modern slavery. Taking the UK as an example, we ensure that:

- temporary workers have a right to work for the duration of their assignment. This involves asking the individual directly to view their relevant identity documentation. A delay in providing proof of identity and/or associated right to work documentation might indicate a modern slavery issue and would be escalated appropriately;
- we take relevant references to ensure the individual is hired in a role that they have both the qualifications and experience to undertake;
- we carry out detailed background checks and ensure all contracts comply with all legal requirements regarding workers’ rights;
- where we provide payroll services as required by our own clients, we check that such temporary personnel have a bank account in their own name into which their remuneration is paid;
- where we are responsible for such temporary personnel while they are on assignment on our client’s premises, they are always free to leave their assignment; and
- temporary workers receive compliant pay as determined by the Agency Workers Regulations 2011.

In addition, all our employees, through the Employee Code of Conduct, are made aware of PageGroup’s requirement for employees to support and uphold human rights principles and know that PageGroup will not tolerate, engage in or support the use of, forced labour.

Our Supply Chain

We include due diligence queries in UK RFP processes to identify our potential suppliers' approach to modern slavery and these assist in our determination of whether the supplier should be considered a high risk supplier. A high risk supplier is sent a questionnaire so we can further assess their approach to the issue of modern slavery.

Supplier contracts place an obligation on suppliers to comply with the Modern Slavery Act 2015 and where appropriate also include rights of audit to help us identify unethical practices. If we were to find evidence that one of our suppliers has failed to comply with the Modern Slavery Act 2015 then we would require the relevant supplier to remedy such non-compliance and we would terminate our relationship should we see no improvement in the way their business is conducted.

This approach is designed to:

- identify and assess potential risk areas in our UK supply chain;
- mitigate the risk of slavery and human trafficking occurring in the supply chain;
- monitor potential risk areas in the supply chain; and
- provide adequate protection to whistle blowers.

In the last 12 months we engaged with our UK high-risk suppliers to ensure awareness of our "Speak-Up" helpline for their employees. A modern slavery questionnaire was issued to pose questions across a number of key areas, including (but not limited to):

- Human trafficking
- Auditing
- Whistleblowing
- Breach monitoring

We reported to PageGroup plc's Board on modern slavery KPIs. The KPIs revealed no cause for further investigation.

In addition, outside the UK, a modern slavery playbook was devised and communicated to all the regions in which we operate providing practical guidance on how to approach modern slavery risk.

Further Steps

Following a review of the effectiveness of the steps taken in the previous financial year to prevent modern slavery or human trafficking occurring in our business, we intend to take the following further steps during the course of the 2022 financial year:

- we will continue to operate the following KPIs: number of upheld complaints (we have a zero-tolerance approach) and in respect of high risk suppliers providing services to our UK business, % of these Tier 1 suppliers mapped and risk assessed and % of engagement and/or audits carried out regarding modern slavery compliance;
- ensure the Group procurement team have successfully undertaken and passed the Chartered Institute of Procurement and Supply (CIPS) ethical training module;

- further enhance our vendor onboarding processes to ensure all new vendors supplying goods/services to the UK are asked to provide detailed information on their human rights policies, practices and approach to managing risk;
- continue with our modern slavery working group comprised of senior leaders from our Legal, Procurement and Facilities functions, which was established in 2020. The group will continue to meet to discuss the actions being taken in respect of modern slavery; and
- ensure our businesses outside of the UK continue to monitor, manage and report modern slavery risks.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 is reviewed and adopted by the Board and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2020.

Steve Ingham, Chief Executive Officer
PageGroup plc

Date: 31 May 2022