MICHAEL PAGE INTERNATIONAL RECRUITMENT LIMITED

MODERN SLAVERY STATEMENT

Introduction from Kelvin Stagg, Director, Michael Page International Recruitment Limited

Michael Page International Recruitment Limited's purpose is to change lives. 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 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.

Kelvin Stagg
Director
June 2024

Michael Page International Recruitment Limited Structure

Michael Page International Recruitment Limited ("the Company") is a specialist recruitment consultancy and the main UK trading company of the PageGroup plc group of companies who trade under the brands of PAGEGROUP, PAGE EXECUTIVE, MICHAEL PAGE, PAGE PERSONNEL and PAGE OUTSOURCING. The company has c.1200 employees operating in the UK, with annual revenue of c. £291m. Our Core business offers permanent and temporary recruitment services across a wide range of disciplines. 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.

We 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

We have evaluated the nature and extent of the Company's exposure to the risk of modern slavery occurring in its supply chain. We do not consider that we operate in a particularly high-risk sector. 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). 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, we have referred to the 2023 Global Slavery Index's list of products with identified risk of forced labour by source countries[1]. The only product areas identified as presenting a higher risk of modern slavery to the Company were:-

- Electronics - Laptops, peripheral devices and mobile phones.
- Timber / Textiles – used within office fit-out projects.

In terms of the services we consume, our risk assessments have determined that cleaning, couriers and confidential waste disposal services represent the only service lines that carry a higher risk of modern slavery.

The Company, like with many other corporate organisations typically consumes products and services in these areas from globally recognised firms who we require to have established modern slavery policies and practices in place, and we continue to monitor their activities on

[1] https://www.globalslaveryindex.org/

an annual basis. To provide additional assurance, we have undertaken enhanced due diligence on our UK suppliers over the past 12 months across these risk areas to ensure they can all exhibit one or more of the following criteria and in doing so underlining their commitment to and controls over modern slavery: -

1. Hold a globally recognised sustainability rating by Ecovadis of at least Bronze or above (these assessments rate businesses based on labour and human rights standard, ethics, procurement practices and environmental impacts).
2. Accreditation such as ISO9001, ISO14001 or ISO45001 which require organisations amongst other criteria to implement effective processes for the control of external suppliers of raw materials/ outsourced services.
3. Provide products which are PEFC[2] or FSC[3] certified.
4. Disclose their own standards and obligations placed on supply chain partners within a Modern Slavery Statement or Supplier Code of Conduct.

This evaluation process across both categories continues an annual basis.

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

The Company prohibits and condemns the use of all forms of forced labour including child labour and any form of human trafficking as set out in the Employee Code of Conduct. 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:

[2] PEFC is the Programme for the Endorsement of Forest Certification - https://pefc.org/

[3] FSC is the Forest Stewardship Council - https://uk.fsc.org/

- 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 the Company's requirement for employees to support and uphold human rights principles and know that the Company will not tolerate, engage in or support the use of, forced labour.

Our Supply Chain

We recognise the role our employees can play in helping to identify modern slavery risks in the supply chain, and in response to this have trained and obtained certification via the Chartered Institute of Procurement and Supply (CIPS) for ethical procurement and supply for all of our UK based Procurement team. We also extended the scope of this training and certification to include all centralised Property and Facilities employees within the UK and Continental Europe, in addition to procurement employees in Europe and APAC.

Alongside incorporating due diligence queries in our UK RFP processes to identify our potential suppliers' approach to modern slavery and risk profile, we have embedded enhancements to our global vendor onboarding process to request all prospective vendors to provide further assurance on their approach to human rights by either providing access to their Ecovadis assessment scorecard or by answering a series of supplementary questions focussed on Modern Slavery and other key sustainability criteria. Where relevant, the Group Procurement function aim to ensure supplier contracts include 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 either remedy such non-compliance or terminate our relationship.

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 whistleblowers.

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

In addition, outside the UK, we have continued our engagement programme by leveraging our modern slavery playbook which sets out practical guidance on how to approach modern slavery and how to engage with suppliers in respect of minimising our risks in this regard. We have also continued our annual certification process for non-UK PageGroup businesses regarding whether they have had, or are aware of, any instances of modern slavery and confirm that they have assessed their modern slavery risk and escalated any concerns to Group Procurement. There were no instances of modern slavery reported in Financial Year 2023 or to date in 2024.

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 2024 financial year:

- Deliver Ethical Procurement training to Property & Procurement staff based in our North American and Latin American businesses.
- Continue to measure the performance of Tier 1 suppliers against KPIs.
- Continue with our monthly Environment, Social & Governance (ESG) working group to discuss the actions being taken in respect of modern slavery, share best practice and identify on-going improvements to our modern slavery risk framework.
- Ensure our business outside of the UK continue to monitor, manage and report modern slavery risks in accordance with the modern slavery playbook.
- Require annual certification of the non-UK PageGroup businesses regarding whether they have had, or are aware of, any instances of modern slavery and confirm that they have assessed their modern slavery risk and escalated any concerns to Group Procurement.
- Further review the insights gained from Ecovadis and our enhanced onboarding checks to support the identification of further improvement opportunities with high-risk suppliers.
- Investigate the viability of providing online modern slavery training to our Suppliers and employees to further raise awareness of modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31 December 2023. The statement was approved by the Company's Board on 20 June 2024.

Kelvin Stagg
Director
Michael Page International Recruitment Limited

June 2024