Modern Slavery and Human Trafficking Statement

Introduction

The Project People Modern Slavery and Human Trafficking Statement sets out our commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chain. We recognise all have a duty to be alert to risks, however small. Staff are expected to report their concerns to management to enable us to act upon them through our robust processes.

This statement covers all the business activities of Project People.

Structure and supply chains

All Project People staff have a personal responsibility for maintaining a respectful work atmosphere, free of abusive or unprofessional conduct. Every employee is expected to respect other people which they touch in our work ecosystem and to treat them with dignity.

Responsibility for Project People's anti-slavery initiatives is as follows:

1. Policies: Legal Counsel is responsible for creating and reviewing policies. The process by which policies are developed is by looking at best practice and adapting to the needs of Project People. This and other policies incorporate the latest thinking and initiatives from our own and other industries where this is applicable to the business that Project People conducts.
2. Risk assessments: Legal Counsel is responsible for risk assessments in respect of human rights and modern slavery. Risks are assessed within our own business and that of clients and suppliers, with an escalation process in place where risks are identified.
3. Due diligence: Legal Counsel is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking when evaluating prospective suppliers.

Policies on modern slavery

Project People believe everyone should have the opportunity to work. Project People complies with all applicable employment laws and our obligation is to ensure fairness in the hiring and advancement of all employees, both permanent and temporary without discrimination.

Project People's commitment to respect in the workplace includes full support for international efforts to promote ethical principles and practices related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking.

Project People is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

Project People also expect commitment to these principles from all organisations with which business is conducted and we will not support or do business with any organisation knowingly involved in slavery or human trafficking.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

1. Reporting - the Company encourages all its workers, customers, and other business partners to report any concerns related to its direct activities or its supply chains.
2. Project People Code of Business Ethics - This sets down the actions and behaviour expected of employees when representing Project People.
3. Environmental Policy - This summarises how we manage our environmental impacts and how we collaborate responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

Project People undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Project People's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of

business partners **and** evaluating the modern slavery and human trafficking risks of each new supplier **and** invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Our supply chain largely comprises five areas:

Providers of resourcing services, who are engaged in multi-tiered managed service contracts to fill vacancies outside of our core specialisms on behalf of clients.

Providers of IT equipment, software, and services, such as computer equipment, office software, and specialist recruitment industry software.

Providers of corporate and professional services such as accreditation bodies, external training and development, brand management and design and business intelligence.

Providers of managed office space in our physical locations and ancillary products including office furnishings and stationery.

Providers of the services required to facilitate business travel, meetings, and events such as company car leasing, flights, hotels, meeting rooms and event spaces and hospitality.

In each of these areas, we work only with trusted and reputable partners with an intent to build long-standing relationships which enable us to understand their business in a deeper fashion. New suppliers are screened for quality and business probity including questions designed to detect any risk of modern slavery or human trafficking, and contracts are structured as such that suppliers are aware of our expectations and their responsibility to comply with ethical business practices throughout their operations. Supplier relationships are regularly reviewed and updated, and any concerns are immediately escalated according to a defined procedure that may result in termination of supplier agreements.

As a provider of resourcing and talent management services concerning highly skilled and experienced individuals, Project People believes the greatest risk of modern slavery falls within our supply chain and we have identified areas where risks are historically heightened for additional layers of due diligence.

Risk Assessment

Project People performs a risk assessment to assess the risk in respect of human rights and modern slavery through review of its own practices and that of its supply chains. The risk assessment is reviewed regularly and no less frequently than annually.

Reporting

Project People has facilities available to staff, contractors, clients, and suppliers to report breaches of our policies our codes of conduct, including modern slavery and human trafficking, both openly with lines of communication open to senior management, and anonymously via documented whistleblowing procedures.

Measuring effectiveness

Project People uses the key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains requiring all staff to have completed training on modern slavery as part of equality and diversity training.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires staff to complete equality and diversity training on induction and every 3 years thereafter.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated, as necessary.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name:	Pank Koria
Position:	Managing Director
Date:	7 June 2023

Signature:	Pank Koria