

Anti-slavery & Human Trafficking



Statement

Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking and has been identified as a violation of fundamental human rights.

The People Group Limited (the “Company”, “we”) has a zero tolerance approach to modern slavery and human trafficking. We are committed to acting responsibly and ethically in our business dealings and have effective systems and controls in place to ensure that modern slavery is not taking place anywhere within our business or any of our supply chains.

The Company is committed to acting in accordance with its disclosure obligations under the Modern Slavery Act 2015 (‘MSA’) and expects the same of its contractors, suppliers and other business partners. The Company’s contracting processes include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

Anti-slavery and human trafficking policy

1. Responsibility for the policy

1.1 The overall responsibility for implementing and ensuring that this policy complies with the Company’s legal and ethical obligations, including those under the Company’s control, lies with Christian Moffatt.

1.2 The person in our organisation with overall responsibility for ensuring that all necessary steps are taken to combat slavery and human trafficking is Christian Moffatt, Director, and any queries or comments relating to this policy or suggestions for improvement should be forwarded to Sophie Jefferys, Executive Assistant at Sophie.Jefferys@peoplegroup.com

2. Compliance

2.1 Employees must ensure that they read, understand and comply with this policy. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

2.2 Employees are expected to comply with all relevant processes as notified to them from time to time.

2.3 Employees must notify Sophie Jefferys, Executive Assistant at Sophie.Jefferys@peoplegroup.com as soon as possible if they believe or suspect that a breach of this policy has occurred or will occur in the future.

2.4 Employees should contact Sophie Jefferys, Executive Assistant at Sophie.Jefferys@peoplegroup.com if there is any uncertainty over whether an issue, incident and/or practice constitutes any of the various forms of modern slavery.

2.5 Employees should report any suspicions that a candidate, or other person with whom they have come into contact, may be a victim of modern slavery or may have committed a modern slavery offence to Sophie Jefferys, Executive Assistant Sophie.Jefferys@peoplegroup.com

2.6 Employees that raise genuine concerns in good faith (even if they turn out to be mistaken) under this policy are protected from detrimental treatment including dismissal, disciplinary action, threats, or other unfavourable treatment due to having made the disclosure.

3. Processes

3.1 The Company already has in place a number of internal processes for ensuring compliance, particularly relating to the registration of candidates. Many of the processes assist in preventing modern slavery and human trafficking, including ID and background checks, obtaining references, checking on right to work in the UK, verifying payment arrangements and working only with suppliers approved or verified by the Company.

3.2 The Company has introduced additional steps and checks in its processes to minimise the risk of modern slavery taking place in its business or supply chains, particularly for employees who are likely to come into direct contact with potential victims of modern slavery (e.g. when registering candidates). These are set out in our annual Slavery and Human Trafficking Statement which appears on our website.

3.3 The Company will continue to monitor the risk of modern slavery in its business and supply chains and take appropriate steps to minimise the risk of modern slavery in its business and supply chains.

4. Communication and awareness

4.1 Training on this policy forms part of the induction process for all individuals who work for the Company and regular training will be provided as appropriate.

4.2 Employees are expected to be vigilant and to be aware of the risk of modern slavery, particularly when registering candidates or dealing with suppliers.

4.3 The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset and reinforced throughout the business relationship as appropriate.

5. Enforcement

5.1 Employees who breach this policy will be subject to disciplinary action in accordance with the Company's Disciplinary Policy and Procedure which can be found in our Employee Manual.

5.2 The Company may terminate its relationship with individuals and organisations working on its behalf if they are in breach of this policy.

Slavery & Human Trafficking Statement

Introduction

1. We are The People Group Limited of 80 Coleman Street, London, EC2R 5BJ. References to "we", "us" and "our" are to The People Group Limited.

2. This Slavery and Human Trafficking Statement is made for the financial year ending 31st December 2021, in accordance with section 54, Part 6 of the Modern Slavery Act 2015 ("MSA").

3. Modern slavery is a violation of fundamental human rights and encompasses slavery, servitude, forced and compulsory labour and human trafficking.

4. We have a zero tolerance approach to modern slavery and this statement sets out the steps that our organisation has taken to minimise the risk of slavery and human trafficking taking place in any part of our business or in any part of our supply chain.

5. In summary, we have reviewed our policies, processes and procedures to ensure that they address the risks posed by modern slavery, including

- training for existing employees
- reporting processes
- undertaking supplier audits
- amending our Employee Manual
- inserting modern slavery provisions into contracts with contractors and suppliers
- introducing additional steps and checks to our processes, e.g. when registering candidates
- compiling a list of approved suppliers with published Slavery and Human Trafficking Statements

6. The person in our organisation with overall responsibility for ensuring that all necessary steps are taken to combat slavery and human trafficking is Christian Moffatt, Director. All enquiries or comments about this statement should initially be directed to Sophie Jefferys, Executive Assistant at Sophie.Jefferys@peoplegroup.com.

Our business structure

7. We operate within the recruitment sector in the UK and worldwide and we act as an employment agency and employment business. We provide recruitment services to our clients, namely introducing and supplying personnel in the construction, property and engineering sectors.

8. We have over 15 employees and a global annual turnover of £50,000,000.

9. Our suppliers and contractors are predominantly UK and EU based.

10. Our supply chains consist of

- suppliers of personnel with whom we work to deliver services to clients.
- suppliers of services to enable us to provide recruitment services to our clients, such as accounting, IT, and insurance.

Our policies on slavery and human trafficking

11. We have an Anti-Slavery and Anti-Human Trafficking Policy ("Policy") which can be accessed through our website. This Policy sets out our commitment to combating modern slavery and human trafficking. Our Policy also details the steps which we are taking to minimise the risk of modern slavery and human trafficking taking place in our supply chain or in any part of our business.

12. We respect and support the principles outlined in the ILO Declaration on Fundamental Principles and Rights at Work: freedom of association and the right to collective bargaining, elimination of all forms of forced or compulsory labour, effective abolition of child labour, and elimination of discrimination in employment and occupation.

Training

13. We provide all our new employees with induction training which includes training on the risks posed by modern slavery and the processes and procedures designed to combat it within our organisation and within our supply chain.

14. We provide all our existing employees with training on the risks posed by modern slavery and the processes and procedures designed to combat it within our organisation and within our supply chain.

Due diligence processes for slavery and human trafficking

15. As part of our zero tolerance approach to slavery and human trafficking and as part of our initiative to identify and mitigate risk, we have specific systems and processes in place which are focussed on recognising and carefully assessing potential risk areas in our supply chain and within our organisation.

16. We understand that no part of our business is immune to the risk of modern slavery. We understand that recruitment businesses in general have a higher than average risk of modern slavery taking place within their businesses and supply chains.

17. We also understand that some of our supply chains and parts of our business have a higher risk of modern slavery taking place, and in particular, those parts of our business involved in placing workers in the construction sectors.

18. We also recognise that there is a higher risk of modern slavery in supply chains involving overseas suppliers of goods and services.

19. As a recruitment business, we already have a number of specific processes and systems in place which are either required by law or recommended as best practice, many of which also assist in identifying and minimising the risk of modern slavery. These include:

- undertaking ID and address checks
- obtaining references
- checking right to work in the UK
- verifying payment arrangements

20. We have reviewed our existing internal processes to ensure compliance and to minimise the risk of modern slavery taking place within our organisation and supply chains.

21. We have compiled a list of approved suppliers that have been verified by us as having published Slavery and Human Trafficking Statements and whom we are satisfied have taken reasonable steps to minimise the risk of slavery or human trafficking taking place within their organisations or within their supply chains.

22. All new suppliers are engaged under written terms requiring them to comply with all laws relevant to their businesses and to take reasonable steps to combat modern slavery within their businesses and supply chains.

Further steps

23. To ensure that our practices are as effective as possible, we regularly review our strategies for minimising the risk of modern slavery within our business and supply chains.

24. Following a review of the effectiveness of the steps we have taken this last financial year to minimise the risk of slavery or human trafficking taking place in our supply chains, we intend to take further steps in the current financial year to combat slavery and human trafficking. These steps are summarised below:

- Implementation of a whistleblowing policy
- Amending our employee handbook and manual with a bespoke section on modern slavery

Key performance indicators

25. We monitor the indicators below to assess the effectiveness of the steps that we are taking to combat modern slavery

- Completion of training
- Percentage of suppliers on approved supplier list
- Percentage of suppliers with published Slavery and Human Trafficking Statements

26. This statement has been approved by the Directors of People Group Limited [Christian Moffatt & Kevin McNeela] and constitutes our organisation's Slavery and Human Trafficking Statement pursuant to Section 54 of the Modern Slavery Act 2015, for the financial year ending 31st March 2025.