Modern Slavery Act Compliance Statement

This statement has been published in line with the requirements of the Modern Slavery Act 2015 and sets out the Company's position on the prevention of modern slavery and human trafficking for the year ending December 2020. It was approved by the Board of Directors in June 2021, being signed off by our Commercial Director, Damian Whitham.

Manpower UK Limited takes the issue of modern slavery very seriously with a zero-tolerance approach to the subject with continual review by the Board and our Operational teams. We work with our clients and registered work seekers as part of our attempts to expose any incidents of modern slavery in the workplace. Our efforts have continued throughout 2020 and we are pleased to report that no incidents were identified in the last year.

Our Business

Manpower UK Limited is a company operating as both an employment agency and business in the UK. We are a subsidiary of ManpowerGroup Inc.

Manpower is the global leader in permanent and temporary recruitment solutions. We have provided UK employers with a range of staffing solutions for over 60 years, providing us with a wealth of industry experience. Through our UK network, we fulfil the needs of more than 5,000 clients on a local and national level, covering all geographies, industries and sectors, with only a few specific exceptions. Each day we have more than 25,000 temporary workers engaged in active assignments and connect more than 16,000 individuals with permanent employment every year.

In the Human Age, where talent has replaced access to capital as the key competitive differentiator, we leverage our trusted brand to develop and sustain a large talent pool to provide clients with access to the people they need, fast.

We create powerful connections between organisations and the talent they need to optimise their competitiveness and unleash their workforce potential. This helps everyone to excel beyond their expectations and powers the world of work.

Conducting business in an ethical and responsible manger is part of our DNA. Testament to this in 2020, ManpowerGroup was named to the Ethisphere Institutes Worlds Most Ethical Companies for the 11th year scoring highly for ethics and compliance, organisational culture, governance, corporate citizenship, and leadership and reputation. Ethisphere is a global leader in defining and advancing the standards of ethical business practice and honours companies driving positive change.

We seek positive assurances from our supply chain that they agree to comply with our corporate social responsibility standards, and due diligence is carried out with existing and prospective suppliers to ensure full compliance. This also forms part of the formal contract and legal review processes that we undertake with all suppliers.

Our Policies

Manpower's policies are established by our Board of Directors, based on advice from HR professionals, industry best practice and legal advice. We review our policies on a regular basis, and as needed, to adapt to changes.

As a company we have the following relevant policies in place:

- Modern Slavery and Human Trafficking Policy: sets out our zero-tolerance approach to modern slavery and our commitment to acting ethically and with integrity in all our business dealings and relationships

and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains

- Ethical Purchasing Policy: stipulates the conditions under which the Company will conduct its business in respect of the procurement of all externally supplied goods and services and requires our supply chain to provide positive assurance towards, including but not limited to, zero tolerance on human trafficking and use of any form of forced or compulsory labour and freedom of employees
- Code of Business Conduct and Ethics: promotes honest and ethical conduct throughout the Company, as well as provides a mechanism to report unethical conduct via the Ethics Hotline to help preserve our culture of honesty and accountability and is part of our annual update training undertaken by all employees
- Corporate Social Responsibility Policy
- Whistleblowing Policy: sets out our position on whistleblowing and encourages the reporting of any legal or regulatory violations or any failure to comply with internal regulations, ethical standards and legislation
- Supply Corporate Responsibility Policy: details our expectation of suppliers to adhere to our ethical and social standards including minimum labour standards
- Fair Labour Practices – worker questionnaire (completed anonymously).

These policies are available to all employees on the Company intranet and are first introduced as part of their initial on-boarding induction when joining the Company. Adherence to our policies is expected of all employees.

Any employee who breaches our policy on Modern Slavery and Human Trafficking Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they do not meet our corporate expectations.

Our Processes for Managing Risk

Our standard practices are designed to protect and promote human rights and fair labour practices throughout the recruitment, selection and employment of both our employees and the work-seekers we place with our clients. Manpower UK Limited operates within all applicable recruitment legislation.

During 2020:

- All existing employees have completed refresher ethical, including modern slavery training annually, part of which includes the Modern Slavery policy
- All employees have been advised on how they can report any concerns they may have associated with Modern Slavery
- Our Compliance team carried out remote audits of our Manpower network. These audits included establishing as an employer, we comply to the Proof of Right To Work rules governed by the Immigration, Asylum and Nationality Act 2006 legislation, undertaking of the right checks at the right time, to establish an individual's entitlement to work. This includes the completion of follow up checks for those employees who have limited permission to be in the UK to ensure we do not employ an individual who is not permitted to work, proof of history/references and qualifications (as relevant) for all our work-seekers.
- Our Payroll Department carried out regular checks on our worker-seekers' bank details to identify where individuals may be sharing bank accounts, or addresses, as this could be an indication of illegal behaviour
- All worker-seekers have on-line access to their weekly pay records allowing them to view all deductions we legally make from their salaries.

Due Diligence

A commitment to human rights, fair labour practices and ethical business dealings is essential to our principle-based culture.

Manpower UK Limited:

- is a member of the Recruitment and Employment Confederation (REC) and has representation on their Employment Policies Committee

- has held a corporate Gangmasters Licence since the inception of the Gangmasters and Labour Abuse Authority (GLAA), formally known as the GLA, which was formed as an independent body arising out of the Gangmasters (Licensing) Act 2004. Its Mission Statement is to work in partnership to protect vulnerable and exploited workers
- is part of the group of organisations that founded SAFERjobs (Safe Advice for Employment and Recruitment) now branded as JobsAware. This is a Recruitment Industry Counter-Fraud Forum, which is a non-profit making organisation created to raise awareness and combat criminal activities that may be attempted on those within the industry or through the services provided by the industry. JobsAware works with the Metropolitan Police, Business, Energy & Industrial Strategy (BEIS), Department for Work and Pensions (DWP), Trading Standards, City of London Police, recruitment industry trade associations and private sector recruitment businesses
- seeks positive assurance, within our UK supply chain, that they agree to comply with the principles of our Corporate Social Responsibilities Policy, which forms part of the contract with our supply chain. Where appropriate, we carry out due diligence on prospective suppliers, as well as auditing existing and prospective suppliers about legal and contractual compliance
- takes a risk-based approach to addressing concerns that may arise from our supply chain. We expect all suppliers to operate in accordance with our Supply Chain Business Partner Policy. We procure that our supply chain disseminates these terms down to their own suppliers and subcontractors.

Our Performance

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

There haven't been any breaches of the Modern Slavery Act reported during 2020.

We review our policies and procedures on a regular basis and as legislation may dictate to ensure not only ongoing compliance to our standards but also that our supply chain shares the same principles and commitment to the Modern Slavery Act.

Training

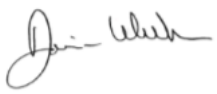
Our **Code of Business Conduct and Ethics** provides guidance to all our staff on the conduct of our business according to the highest moral standards. The Code and our other ethics policies help to focus our staff on the areas of this type of risk. It offers guidance in recognising and dealing with any ethical issues and provides mechanisms to report unethical conduct without fear of retaliation.

The code provides a compliance hotline for employees to inform (on an anonymous basis) any concerns with activities of the Company or the supply chain. This can be found on the company's intranet.

All staff are required to complete the **Business Conduct and Ethics training and certification** annually to build their training and knowledge on the subject.

Additionally, where we have supply arrangements in a sector where the use of modern slavery practices have been evidenced (e.g. food pickers and packers), we have introduced further training for the recruitment teams involved.

Signature:



Damian Whitham
Commercial Director

Date: 16 June 2021