Modern Slavery Act Compliance Statement

BROOK ST.

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 2025. It was approved by the Board of Directors in June 2026, being signed off by our Commercial Director, Damian Whitham. Brook Street (UK) Ltd 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 2025, and we are pleased to report that no incidents were identified in the last year. We are in support of the Act and will not knowingly work with any businesses found to be involved in modern slavery.

Our Business

Brook Street (UK) Ltd is a leading UK recruitment organisation with a long-established history of delivering ethical, compliant, and people-centred workforce solutions across the public and private sectors. Founded in 1946, Brook Street has operated in the UK for 80 years and is recognised as one of the country's most trusted providers of temporary and permanent recruitment services.

The organisation specialises in Customer Care recruitment, including contact centre solutions, and Business Support services, covering administration and clerical, HR, finance, and procurement roles. In addition, Brook Street operates a dedicated Care division, delivering specialist recruitment solutions across adult services and children's services.

Brook Street supplies labour at scale to central and local government, health and social care, education, justice, and commercial clients, supporting thousands of workers into meaningful employment each year.

With a nationwide network of strategically located branches and delivery centres, Brook Street maintains strong local labour market knowledge while operating robust, standardised compliance and assurance processes across all regions. This infrastructure enables close engagement with both workers and clients, supporting transparency, worker welfare, and effective oversight throughout the recruitment lifecycle.

Brook Street is committed to operating responsibly and ethically, with zero tolerance for modern slavery, human trafficking, or worker exploitation. The organisation actively supports fair pay, lawful working practices, and safe working conditions, and works collaboratively with clients, suppliers, and partners to uphold high standards across its supply chains. These commitments are reinforced through rigorous compliance checks, mandatory training, supplier due diligence, and alignment with relevant UK legislation, including the Modern Slavery Act 2015.

Our Policies

Brook Street 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 within our supply chains and guidance to immediate action if modern slavery is suspected.

- **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 BS MSACS 06/25 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 Ethics and Compliance Learning Program undertaken by all employees.

- **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.

- **Supplier Values & Code of Conduct Policy** details our expectation of suppliers to adhere to our ethical and social standards, including minimum labour standards and comply with modern slavery legislation.

- **Labour Standards Policy** applies to all employees and associates and outlines the Company's commitment to upholding ethical labour standards, ensuring the rights of all employees and contractors are respected and protected.

- **Environmental, Social and Corporate Governance (ESG) – Working to Change the World** is an evolution of our Sustainability Plan and Pillars to encompass broader priorities in line with common metrics around ESG - focusing on those areas most material and of highest impact to those we serve. 'People & Prosperity' is a key theme, championing diversity, equity, inclusion and belonging, whilst improving employability and prosperity for all. Our approach reflects both the World Economic Forum's International Business Council Stakeholder Capitalism Metrics and our focus on prioritising the five UN Sustainable Development Goals where we can deliver the greatest impact.

Our Modern Slavery and Human Trafficking policy provides guidance to employees on the action to be taken should any incidents of this nature be suspected and adherence to all 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.

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

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. Brook Street operates within all applicable recruitment legislation.
We take our obligations seriously regarding the provision of temporary workers and have established and audited procedures to ensure that they are not at risk of modern slavery.

During 2025:

- all existing employees have completed annual refresher training as part of our Ethics and Compliance Learning Program, which includes the Modern Slavery and Human Trafficking Policy.

- our Compliance and Audit team carried out audits of our Brook Street network. These audits include establishing as an employer, we comply with 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 required) for all our workers.

- our Payroll department carried out regular checks on our workers bank details to identify where individuals may be sharing bank accounts, or addresses, as this could be an indication of illegal behaviour.

- all workers continue to have on-line access to their weekly or monthly 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.

Brook Street:

- 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), which was formed as an independent body arising out of the Gangmasters (Licensing) Act 2004. Its mission Statement is to work in partnership, stop the exploitation of workers in the UK and to ensure employers treat them fairly.

- is also a partner of JobsAware a not-for-profit organisation, a brand of the Modern Work Foundation that exists to help make the UK labour market safer. Building on the Modern Work Foundation success, JobsAware was launched as the UK's number one platform for protecting worker rights, working closely with EAS, the Home Office, HMRC, law enforcement, DBS, and other partner organisations.
  JobsAware's mission is to protect and advance worker rights in the UK, in three important ways:
  - Ensuring all workers and work-seekers in the UK have access to free help and advice.
  - Working with employers and recruitment businesses to help prevent job scams and labour market abuses.
  - Bringing the voices of workers and businesses to UK Gov, to help inform labour market policy.

- Is a member of Sedex, whose mission is to supply data-driven insights, tools, and services to help companies continuously improve environmental, social, and governance (ESG) outcomes.

- seeks positive assurance, within our UK supply chain, that they agree to comply with the principles of our Supplier Values & Code of Conduct 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. Modern Slavery considerations are included as part of our risk management and supplier selection processes. We also review how we align with our suppliers on this issue. We expect all suppliers to operate in accordance with our Supplier Values & Code of Conduct Policy. We procure that our supply chain disseminates these terms down to their own suppliers and subcontractors.

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.

All policies are published and available to all employees on the Company's intranet and incorporated into our training programs. All employees are required to complete the **mandatory Ethics and Compliance Learning Program 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 is a known concern (e.g. food pickers and packers), we have introduced further training for the recruitment teams involved. Our membership of ALP has also provided us with access to further training resources on this and other recruitment processes.

Our Performance

In 2024 ManpowerGroup UK joined TENT UK, a coalition of 80+ major companies from across the country stepping up to help refugees enter the British labour market through job preparation and employment.
The coalition is committed to supporting refugees through hiring, training, and mentorship. The organisation supports refugees who can be some of the most vulnerable in our society and therefore prey to modern slavers.
ManpowerGroup UK have supported a number of events, including employment fairs offering CV writing tips, advice on how to prepare for the world of work and also signposting to ensure they stay safe in their search for employment.

World's Most Ethical Companies 2025 - Ethisphere has recognised ManpowerGroup as a World's Most Ethical Company and a global leader in defining and advancing the standards of ethical business practices. This marks the 16th time ManpowerGroup has received the distinction, and the company remains the only one in its industry to be

recognised for more than 16 years for playing a critical role in driving positive change in societies and communities around the world.

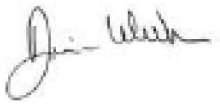
Glass Lewis Sustainalytics ESG Rating 2025 - ManpowerGroup's performance in environment, social and governance (ESG) has been recognised by Glass Lewis & Sustainalytics. We're proud to be leading in our industry in ESG – as well as being in the 2nd percentile of all companies (#94 of 13,676), 4th percentile in Commercial Services (#13 of 380) and 1st percentile in HR Services subindustry (#1 of 57).

There have not been any breaches of the Modern Slavery Act reported during **2025**.
As to the future, we will continue to:

- provide **mandatory Ethics and Compliance Learning Program and Certification** annually including Modern Slavery to all our employees.
- promote the importance of human rights across our business.
- carry out internal audits of our branch network.

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

Signature:



Damian Whitham
Commercial Director

Date: 30 June 2026