

This statement was made on or about 1 April 2025 pursuant to section 54(1) of the Modern Slavery Act 2015 (UK), the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW) and constitutes the Group's slavery and human trafficking statement for the financial year ending December 2024, and as approved by the directors of Impellam Group Limited ("Impellam").

Impellam do not believe there is any place in today's world for slavery or human trafficking. We are committed to maintaining the highest standards of ethical business practices. We are fully dedicated to ensuring that modern slavery and human trafficking do not take place within our businesses or supply chains. We are continually reviewing our practices to ensure this and require equally high standards from our supply chain and other business partners. This statement outlines the steps we have taken and continue to take to combat modern slavery and human trafficking in our operations.

We believe in the power of work.

Through the power of work, we build better businesses and help people lead more fulfilling lives

With 1,500 people and market leading brands across a broad spectrum of industries Impellam offers unparalleled workforce and STEM talent solution expertise to provide customers with mission-critical skillsets to future-proof their business.

Our award winning Global Managed Services provide a diverse range of digitally enabled, multidisciplinary workforce solutions to organisations. We are upper quadrant industry leaders in Managed Service Provision and Services Procurement and I.T and the sixth largest Managed Service Provider globally by revenue operating in over 70 countries with over £5bn SUM (Spend under Management).

Our STEM businesses are specialists in recruiting and engaging talent in the key growth markets of technology, digital, data analytics, science, clinical and engineering. We work with clients across all sectors and sizes.

Our vision is to be the world's most trusted workforce and STEM talent solutions group trusted by our people, our customers and our investors in equal measure. This vision, together with our shared signature practices, gives clear guidance on the behaviours and actions we expect from all the people and organisations that work with Impellam. We choose to engage and partner with like-minded organisations because they recognise people should be treated with dignity and respect.

Our Commitment

We are committed to:

- Preventing modern slavery and human trafficking in our operations and supply chains;
- Promoting transparency and ethical practices in every aspect of our business;
- Complying with all applicable legislation;
- Providing training to employees and business partners to help identify, prevent and respond to

potential cases of modern slavery.

Policy and Training

Impellam's Legal and People Support teams have implemented a number of internal policies to combat modern slavery. We have a suite of policies including:-

- a Code of Business Conduct, which outlines our commitment to ethical business practices and sets clear expectations for our employees and partners;
- a Whistleblowing policy which encourages employees and others to report any concerns regarding modern slavery or unethical practices without fear of retaliation;
- a Bribery and Corruption policy which explains to employees that Impellam does not tolerate fraudulent or corrupt dealings and what constitutes bribes.

All Impellam employees have access to our policy suite from day one of their employment. Employees undertake initial on-boarding training and annual refresher training on our bespoke learning and development platform KnowHow. This training includes modules on Modern Slavery, Whistleblowing, Bribery and Corruption, Sustainability and incorporates a review of the associated policies. This training includes:

- Identifying potential indicators of modern slavery in the workplace and supply chains;
- Understanding the legal and ethical obligations related to modern slavery;
- Reporting mechanisms to raise concerns or suspicions regarding modern slavery.

Adherence to Impellam policies is expected of all our employees and any breaches will be taken seriously and employees are asked to acknowledge and confirm that they have read and understood these policies and procedures.

Details on how employees can report any concerns is covered in these policies and employees are regularly reminded of our confidential whistleblowing helpline if they wish to make an anonymous report.

Our policies are reviewed annually to ensure they are still fit for purpose and this review was undertaken in 2024.

Supply Chain

Impellam purchases a wide range of products and services from its supply chain, including IT and telecommunications; equipment and supplies; utilities; travel services; and training services.

Impellam also engage with a large number of likeminded workforce solutions suppliers such as recruitment agencies, recruitment businesses, umbrella organisations, consultancies, SOW providers and personal services companies.

Impellam's Supplier Code of Conduct reflects our responsibility to act ethically and with integrity in all our business relationships, including our commitment to combating human trafficking and slavery. We believe

our highest areas of potential risk are within our supply chain, and in the provision of agency labour.

We require all suppliers to:

- Adhere to our Supplier Code of Conduct;
- Implement procedures to identify and address any risks of modern slavery within their own operations and supply chains;
- Ensure that workers are treated fairly and compensated in accordance with all applicable laws.

In 2024 we issued our Modern Slavery Ethical Trade and Human Rights Questionnaire ('Supplier Questionnaire') to a wider selection of active suppliers. Responses were reviewed by our Customer Experience team and whilst no concerns were raised, the team feel that suppliers will benefit from a greater understanding of the purpose of the Supplier Questionnaire and plan to roll out training later this year for our supply chain, to ensure they understand and complete the Supplier Questionnaire fully before the 2025 issue.

In 2024, all our managed service accounts received at least one compliance audit during which pre-employment checks, including eligibility to work, references, qualifications, were reviewed.

In 2024 we updated our Supplier Code of Conduct to include sections on the Environment and Harassment as our business focuses on its wider sustainability goals. We plan to expand the scope of the Supplier Questionnaire to include questions on sustainability and corruption in 2025.

Workers

Our Payroll team undertake a weekly electronic report to check payroll details for all our agency workers to identify address and bank detail similarities and these are investigated and escalated to our Quality and Risk Assurance Manager where appropriate.

Payslip audits are also undertaken on our umbrella providers and in 2024 we will look at ways of ensuring they are undertaking similar robust and appropriate checks to their workers. In the U.K, we are keeping abreast of government guidance and await the publication of legislation following a consultation on the use of these organisations. All umbrella companies used by Impellam are required to be FCSA accredited and in 2025 we will require that our supply chain only engage with FCSA accredited umbrellas also.

Impact Report

Increasingly people are looking to businesses to lead the way on regulatory, economic, environmental and social sustainability. As a purpose-led, connected business we're uniquely placed to help build better businesses and help people lead more fulfilling lives through the power of work.

We have created an ESG Impact Report to highlight our social impact, and our CSR and sustainability strategies. The report showcases how we're helping to create inclusive and welcoming workplaces by removing barriers to employment, and how we are providing life-changing opportunities for our candidates.

We share our wellbeing, social purpose and ED&I initiatives and are transparent about our journey to Net Zero. The report shares strategy and inspiration for how, together, we can change businesses, change lives and change futures.

Our Impact Report can be downloaded and read at:

<https://www.impellam.com/insights/impellam-launches-impact-report>

Summary

This statement applies to Impellam Group Limited and all its subsidiaries globally, including the following subsidiaries incorporated in Australia and the United Kingdom:

- Carbon60 Limited;
- Comensura Limited;
- Comensura Pty Limited;
- Guidant Global UK Limited;
- Impellam APAC Pty Limited;
- Impellam UK Limited;
- Lorien Resourcing Limited;
- Science Recruitment Group Limited.

We consulted the relevant companies Impellam Group Limited owns or controls in the development of this statement.

Impellam is an international connected group providing global workforce, specialist recruitment, labour-hire and associated solutions. Our 1,500 people and market leading brands work across a broad spectrum of industries and job categories throughout North America, the UK and Europe and APAC. The Group had a global annual turnover in 2024 of £2.0bn and has its registered office in Luton, Bedfordshire.

No breaches of the Modern Slavery Act by Impellam were reported during 2024.

Signed for an on behalf of Impellam Group Limited and all its subsidiaries globally.



Tim Briant

**CFO Impellam Group
Limited**

Date 21st March 2025