Statement on Modern Slavery and Human Trafficking

Modern Slavery Act 2015

Modern slavery is an international crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Modern Slavery Act 2015 is designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England and Wales and became law on 26 March 2015.

This statement sets out McGregor Boyall Associates' actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and its supply chains.

As part of the recruitment and staffing industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Modern slavery is a criminal activity and a violation of human rights. The deprivation of a person's liberty by another in order to exploit them for personal or commercial gain is unacceptable.

McGregor Boyall operates a zero-tolerance approach to slavery and human trafficking and is absolutely committed to preventing such activity in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure

This statement covers the activities of McGregor Boyall Associates Ltd and is signed off by Lucy Frost, Group Managing Director.

Founded in 1987, McGregor Boyall Associates is a women-owned employment business and consultancy providing permanent and contract / interim professionals to a wide range of public and private sector clients across a variety of disciplines; Change & Transformation, Compliance, Data & Analytics, Digital, Finance & Audit, Financial Crime, HR, Information & Cyber Security, Marketing, Procurement, Risk, Software Quality Engineering and Technology. We employ just under 100 employees across 4 locations worldwide and have a global turnover in excess of £40,000,000.

McGregor Boyall currently provides recruitment and consultancy services in the following regions:

- UK and Europe (from our offices in London, Manchester, and Edinburgh)
- Middle East (from our office in Dubai)
- North America (from our office in London)

Our Senior Leadership Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all of our employees and supply chain comply with it. The Compliance and Operations Teams have primary and day-to-day responsibility for implementing this policy and reviewing the risk profile of our supply chain to ensure that any procedures implemented are effective in monitoring modern slavery.

Our Internal Policies

This statement runs in conjunction with a number of internal policies employed by McGregor Boyall to ensure that we are conducting business in an ethical and transparent manner.

These include:

- Equality, Diversity & Inclusion Policy: This policy sets out our stance as an equal opportunities employer.
- Human Rights & Human Rights in the Workplace Policy: This policy sets out our commitment stance to protecting and promoting respect for human rights.
- Child & Forced Labour Policy: This policy outlines our commitment to complying with all international labour standards, as well as UK legislation.
- Whistleblowing Policy: We operate a whistleblowing policy to ensure all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Internally, McGregor Boyall engages with our employees and candidates in a respectful and professional manner and has a dedicated, independent Compliance and Pre-employment Screening Team. They ensure strict compliance with all our contractual employment obligations and that our employees and candidates clearly understand their rights under UK and international legislation.

All employees are paid above the national minimum wage and have access to a suite of benefits including private healthcare and pension. Training on the above policies forms part of our Induction Process and employees' obligations in relation to these policies are outlined in our Staff Handbook. All policies are available on our Staff Intranet.

Clients and Supply Chains

McGregor Boyall places overriding importance on working only with suppliers and clients who meet our own standards of compliance with local legislation, including the Modern Slavery Act 2015, and who place equal importance on their obligations towards eliminating modern slavery that McGregor Boyall does. McGregor Boyall will not work with any organisation that is unable to demonstrate an equal commitment to this subject, irrespective of any statutory obligation to do so.

McGregor Boyall recognises that some of the sectors in which its clients operate will be more susceptible to human trafficking and slavery than others, but we are fully committed to ensuring the highest standards, irrespective of sector. We believe that, in conjunction with rigorous policies implemented by our clients, we can

drive out any aspects of human trafficking and slavery from our and our clients' supply chains. Whenever applicable, McGregor Boyall will identify to its clients any non-compliance with the legislation.

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our supply chains, with our clients and internally;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains and with our clients; and
- Protect whistleblowers.

To support us in our business activities we use a range of suppliers for advertising and candidate sourcing, as well as standard business suppliers such as stationery and technology providers.

McGregor Boyall operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offences relating to modern slavery. Our anti-slavery statement forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this statement.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK-based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations

We may terminate the contract at any time should any instances of modern slavery come to light.

Where McGregor Boyall is engaged as a first or second-tier supplier we audit such organisations against legislative compliance, including compliance with the Modern Slavery Act, and identify any legislative non-compliance to its clients. McGregor Boyall's Compliance and Pre-employment Screening Team are required to verify a worker's right to work in the relevant country before we can supply their services to clients.

Due Diligence Process

McGregor Boyall ensures strict compliance checks are carried out for all employees and candidates it supplies. We run vigorous checks on each worker to verify their identity and their right to work before supply commences.

As part of our commitment to identify and eradicate slavery and human trafficking, we undertake due diligence on our supply chain network to ensure compliance with legislative obligations; such compliance forms part of our contractual relationship with suppliers.

Training and Review

McGregor Boyall's Statement on Modern Slavery & Human Trafficking Statement forms part of our formal induction process and guidance for employees on factors that could indicate that a worker may be subject to undue influence form part of our Employee Handbook.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for McGregor Boyall or under its supervision or control. All persons are required to avoid any activity that might lead to, or suggest, a breach of the law or a violation of human rights. All employees are actively encouraged to report any suspicious activity or circumstances to the Senior Leadership Team and Modern Slavery Helpline.

McGregor Boyall's Senior Leadership Team believe that driving out slavery in any form from its supply chains is fundamental and central to the aims and values of McGregor Boyall. Accordingly, this statement has been approved by the McGregor Boyall Senior Leadership Team.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes McGregor Boyall's Modern Slavery and Human Trafficking statement in respect of its financial year January 2024–December 2024.

Signed:

Lucy Frost

Group Managing Director

McGregor Boyall Associates Ltd

Last updated: 24th January 2025