

MODERN SLAVERY AND ETHICAL SOURCING STATEMENT

Introduction

Modern slavery is a crime resulting in an abuse of human rights. It is constituted in the Modern Slavery Act 2015 ("Act") by the offences of 'slavery, servitude and forced or compulsory labour', and 'human trafficking' to include the fact slavery and human trafficking are abuses of a person's freedom and rights.

Allegis Group is totally opposed to such abuses in all our operations whether direct, indirect or in our supply chain. We are committed to improving our practices to combat slavery and human trafficking, to ensure that slavery and human trafficking do not take place in any part of our business or supply chains. Furthermore, it is our policy to conduct all our business in an honest and ethical manner and in accordance with the letter and spirit of applicable legal and regulatory requirements in the jurisdictions in which we carry out our operations.

Our Business

Allegis Group (UK) Holdings Limited, through its subsidiary Companies, is a provider of both permanent and contract-based resources, offering specialised and client focused staffing solutions to a wide range of household names and smaller businesses. Allegis Group (UK) Holdings Limited has several subsidiaries based in the UK including:

- Allegis Group Limited
- Allegis Global Solutions Limited

The Company is focused on a range of brands which enable us to offer a broad selection of staffing and services solutions across different industries.

We undertake checks in relation to all candidates and contractors who we introduce to clients to ensure that we clearly establish their identity. For individuals this includes checking documentation such as their passport and right to work documentation. For limited companies this includes checking documentation in respect of their incorporation, insurance and tax status. We are also committed to providing rates of pay in excess of the relevant national legal minimum standard.

Our Supply Chains

Our supply chains include the sourcing of candidates for onward supply to our clients. Any other agencies or intermediaries that introduce candidates and contractors for onward supply to our clients are known to us via existing long-term relationships and/or we have undertaken due diligence to satisfy ourselves that they adhere to local laws and maintain the highest ethical standards. We expect our suppliers and potential suppliers to operate in an ethical, legally compliant and professional manner and they are provided with our Supplier Code of Conduct and are expected to abide by it. Our other supply chains include:

- Facilities Management Companies
- Communications and IT Service Companies
- Office Equipment and Supplies
- Utility Service Companies

Relevant Policies

Our relevant policies include:

- Anti-Modern Slavery and Human Trafficking Policy
- Staff Code of Conduct
- Supplier Code of Conduct
- Whistleblowing Procedure (including non-retaliation policy)

Our policies and Code of Conduct set out the behaviours we expect from employees in their dealings with colleagues, customers, suppliers, agents etc. All employees are expected to act with integrity in accordance with the standards of behaviour set out in the Code of Conduct. We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions. We pro-actively encourage employees to report instances where they become aware of a situation that is not in accordance with Allegis' Global Code of Conduct, internal policies or applicable law. All employees have access to an external hotline (phone and internet) that is available 24 hours a day and are encouraged to make use of this channel and others to report at the earliest opportunity any concerns.

Due Diligence for Slavery and Human Trafficking

We consider the greatest risk of slavery and human trafficking to be in our supply chain where operations and management oversight are out of our control. In 2018 we reviewed our procurement process and during 2019 we rolled out an updated procurement policy and procedure which included due diligence of third parties and a requirement for suppliers to confirm compliance with the Modern Slavery Act. As part of the refreshed due diligence procedures we also have put in place follow-up checks where these have been identified as required and we take a risk-based approach to identifying those suppliers who require more frequent checks.

We have zero tolerance to slavery and human trafficking and expect all those in our supply chain, and our candidates and contractors, to comply with our values. Wherever possible we build long standing relationships with suppliers and make clear our expectations of business behaviour.

Monitoring and Compliance

We are implementing steps to measure how effective we have been and are becoming in order to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. These include:

- Training of employees including raising awareness of our procurement policy and corresponding supplier due diligence
- Monitoring of complaints
- A level of communication and personal contact with the next link in the Supply Chain, and their understanding of, and compliance with, our expectations.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2019.



Paul J. Bowie

Director
Allegis Group (UK) Holdings Limited

Date: 20 April 2020