

Modern Day Slavery Statement

PURPOSE OF THIS STATEMENT

Modern slavery is a global and international crime affecting millions of people worldwide, including many victims within the UK. Men, women and children of all ages and backgrounds are victims of human trafficking, forced labour, domestic servitude or debt bondage.

This document sets out the policy of Gi Group Recruitment Ltd with respect to preventing opportunities for modern slavery to occur both within its own and its supply chain's daily business activities. This fulfils our obligation under section 54 of the Modern Slavery Act 2015.

BUSINESS OPERATIONS

The Gi Group is one of the world's leading companies providing services to the development of the labour market. The group is active in the fields of temporary, permanent and professional staffing, search and selection, executive search, outsourcing, training, outplacement and HR consulting.

The UK brands that this statement applies to are Gi Group Recruitment Ltd, Grafton Recruitment Ltd, Marks Sattin, INTOO and TACK UK.

RESPONSIBILITY FOR THIS STATEMENT

Ultimate responsibility for the implementation of this statement rests with the Executive Management Team (EMT) and the Training, Compliance and Human Resources Departments of the company.

This statement covers the financial year January to December 2021.

RISK ASSESSMENT PROCESS

During quarter 1 of 2022 Gi Group completed an annual modern slavery risk analysis. This included an annual completion of the Stronger Together Good Practice Implementation Checklist, updating the Modern Slavery Risk Register, conducting a Worker Survey, high risk location risk-assessments and completion of an annual report. Activities are given a risk rating based on risk scores relating to the likelihood of a breach, severity of impact of a breach, and central controls in place. The process confirmed the following specific areas of risk in relation to our day to day business activities:-

- Internal employees (temp or perm) working directly with a Gangmaster (GSTR) out of choice or necessity
- Existing temporary workers acting as a liaison between ourselves and a GSTR
- Client employees acting as a liaison between ourselves and a GSTR
- Second tier supplier knowingly working with a GSTR
- Second tier supplier unknowingly working with a GSTR – no supplier control
- Key supplier knowingly sourcing goods with slavery in the supply chain
- Key supplier unknowingly sourcing goods with slavery in the supply chain – no supplier control
- Suppliers sourcing goods from high risk countries
- Suppliers providing goods and services at rock bottom prices
- Suppliers utilising agencies themselves or within their primary supply chain

With regards to the supply of temporary and permanent staff Gi Group have focused attention on 23 customers who present the highest risk. These companies have been selected by using specific criteria which highlighted particular risks, such as, volume and frequency of the staff supplied, the location of the company's site and the nationalities of the temporary and permanent candidates that are being supplied.

PREVENTION

Taking the key areas of risk into account, we aim to prevent opportunities for occurrences of modern slavery by focusing on 3 business activities:

1. Development of policy/codes of practice
2. Raising awareness
3. Effective process implementation/consistent checking and auditing

POLICY/CODES OF PRACTICE

The Gi Group key policies and codes of practice which relate to the prevention of modern slavery are:

- Gi Global Code of Ethics
- Ethical Recruitment Policy
- Preventing Hidden Labour Exploitation Policy
- Anti-bribery Policy
- Public Interest Disclosure Policy
- Responsible Recruitment of Workers Policy
- ETI Base Code
- Stronger Together Initiative Code of Conduct
- Second Tier Supplier Agreements

RAISING AWARENESS

Permanent Employees

Gi Group operational permanent employees are made aware of the Gi Group policies and internal process relating to the prevention of modern slavery as part of the core operations training programme. Classroom and on the job training is supported by specific online modules and substantial guidance and reference material which can be located on GiNET. During 2021 we delivered training to 160 employees.

Gi Group commitment as a Stronger Together Business Partner and Responsible Recruitment Toolkit (RRT) full subscription along with our active participation as members of the Association of Labour Providers, the Recruitment and Employment Confederation and the GLAA Labour Provider/User Group open up essential communication channels which enable us to provide a consistent flow of up to date information and support tools.

Strong central control supports the operational network and therefore the Head Office team are

clear about the standard checks and subsequent reports that they need to make and produce which may in turn lead to the identification of potential issues.

Temporary Workforce

No fee or cost of recruitment will be charged to the Gi Group temporary workers. Where it is identified that payment of this kind has been made to Gi Group, the payment will be fully refunded.

Initial awareness is raised by playing the Stronger Together video as part of the recruitment process. Additional Stronger Together resources, including advisory posters and leaflets, are placed in prominent positions within all of our locations; and the internal audit process ensures consistent delivery in this.

A temporary worker's welfare also forms an essential part of the initial interview process and then the ongoing relationship that Gi Group has with them. Workers are encouraged to report any concerns that they have at any time during their relationship with Gi Group, including confidential issues.

Gi Group also provides formal communication channels via worker interviews during the internal audit process (56 interviews in 2021), central satisfaction surveys and the Gi Group modern slavery helpline.

Worker Surveys are to be carried out twice a year, with one completed in February and November 2021. Questions cover arrangements for obtaining work, transport to work, payment of wages, living arrangements, RTW document availability and knowledge of Stronger Together initiatives. In total 5,250 completed responses were received (20% response rate in Feb-21 and 14% in Nov-21), and key findings were:

- 88% of respondents state that they do not rely on someone else for transport. 1% of respondents state they get to work via either minibus or in a vehicle with someone they don't know
- 98% of respondents are paid into their own bank account. 0.6% (Feb-21) and then 0.4% (Nov-21) of respondents have their wages paid into a friend or other non-family members account, and in Nov-21 all those who have worked for Gi Group for over 6 months are paid into their own account

- 65% (Feb-21) and then 57% (Nov-21) of the respondents live in rented accommodation. 3.1% (Feb-21) and then 2.5% (Nov-21) of respondents state that they live in rented accommodation and their landlord is employed by Gi Group
- 1.6% (Feb-21) and then 2.9% (Nov-21) of respondents state they are not currently in possession of their RTW docs, although most of these state it is due to the documents being submitted as part of visa application
- 70% of respondents state they have an excellent or good understanding of Stronger Together initiative, and 12% state they have poor knowledge
- 38% (Feb-21) and then 31% (Nov-21) of respondents wished to receive further Stronger Together information via email.

A follow-up survey improvement action plan, which included specific follow-up with some workers, was completed and closed.

The Gi Group time and attendance systems safeguard against worker substitution. Processes are in place to identify duplicate bank accounts, home addresses, NI numbers, landlord and next of kin details to support the quarterly monitoring carried out by the compliance team; and concerns are escalated where necessary.

Suppliers

Gi Group have placed suppliers into two categories:

- **Category 1:** second tier suppliers who supply temporary workers to our operational locations
- **Category 2:** those who supply general goods and services to Head Office and the operational network

Category 1: Gi Group consider second tier suppliers of temporary staff to be a higher risk as they will face the same key issues as we do ourselves. Prior to being approved, all potential suppliers are issued with the Supplier Code of Conduct, complete the standard Supplier Questionnaire (which includes a Modern Slavery section), and sign a Supplier Agreement. Where required they will undergo an audit of their internal process prior to supplying temporary staff.

Depending on the frequency of the supply, second tier agencies will also be subject to audits from our internal team. The aim of the audit is to ensure that a second tier supplier is implementing the commitments detailed within the Gi Group Supplier Questionnaire, Supplier Agreement and Policy statement. As part of the audit Gi Group also use the Stronger Together Good Practice Implementation checklist to benchmark the current process that each supplier has in place and this will also support the suggestions for actions that can be taken to make improvements to what they already have in place.

Category 2: operating predominantly as a service provider, the range of goods and services that Gi Group purchase is relatively limited, however this does not mean that we underestimate the opportunities for occurrences of modern slavery from within our supply chain. Gi Group maintain an approved supplier list, and beginning with the key supplier, risk assessment is to be completed upon renewal / review of supplier arrangements. Once complete, a supplier risk profile is updated with any specific issues being raised on a supplier by supplier basis.

EFFECTIVE PROCESS IMPLEMENTATION AND CONSISTENT CHECKS AND AUDITING

Establishing policy and procedures and raising awareness by delivering training and establishing effective communication channels creates the framework for the prevention of modern slavery and is a natural starting point.

Consistently checking that the theory is being implemented practically on a daily basis establishes the current effectiveness of the framework and will also identify improvements which can be made. All operational locations have the initial responsibility for ensuring that all of the key processes are implemented and that the relevant checks are taking place. The Gi Group central audit team carries out the following audits during the course of a trading year, in relation to the prevention of modern slavery:

- Pre-arranged operational location audits (including temporary worker interviews)

- Pre-arranged audits of live recruitment and induction sessions
- Spot check operational location audits
- Spot check remote operational audits (including RTW and NLW compliance)
- Spot check remote audits of effective use of relevant IT equipment
- Pre-arranged Head Office-specific right to work in the UK audits
- Temporary worker complaint audits
- Second tier/supplier audits

The Gi Group temporary worker management systems enable us to take regular snapshots of the diversity of the nationalities that we currently have working at all operational locations. This enables Gi Group to identify any unusual patterns or concerns relating to nationalities which may pose the highest risk.

We believe that the activities which have taken place during 2021 have been an improvement on those that were previously in place. Improvements include the introduction of a Remediation Procedure and Policy, the introduction of a Responsible Recruitment of Workers Policy, and completion of an RRT Self-Assessment leading into an action plan.

1 modern slavery concern was reported to the GLAA by Gi Group in 2021 following suspicious contact made with a Gi Group client-site team by someone offering to arrange quick provision of Eastern European labour. A strong active relationship with ALP and GLAA has been maintained in 2021 / 2022, with Gi Group representation in the GLAA compliance process / strategy consultation, GLAA Labour Provider and Labour User Liaison Group meetings, a Labour User / Labour Provider and Worker / NGO Liaison Group, the ALP AGM, council meetings and weekly / monthly ALP member support forums.

During 2022 Gi Group are aiming to work more closely with both our highest risk customers, second tier suppliers and the enforcement authorities to ensure that strategies and activities become more aligned.

Results of the above are collated and reviewed by the Executive Management Team and subsequently are made available to all internal employees. The Managing Director Corporate Accounts has the direct responsibility for reviewing/evaluating any central reports with a view to identifying, communicating and addressing any potential areas of concern both internally and with the relevant external authority when it is necessary to do so.

KPIs

The main KPI / targets performance in 2021 is outlined below:

| KPI & Action | Target | Result |
|---|---|---|
| Identifying and addressing MDS concerns: Maintain a nonconformity tracker, completion of quarterly bank / address / NI checks, and worker surveys | Identification and closure of a minimum of 1 investigation per quarter | N/a (all identified duplicate issues closed – no escalation required) |
| | Increase the volume of worker interviews by 5%, which will always include second tier workers where relevant (59 completed in 2020) | Not achieved (56 completed - impacted by Covid-19 restrictions) |
| Training & Awareness: Quarterly ops staff training review, improvement of online module and ops manual content, and increases provision of information to candidates | Improve the incident investigation and people-centered safeguarding process within the online training and ops manual using Stronger Together resources (Investigation Checklist, Workplace Critical Issue Reports and Remediation Records) | Achieved |
| | Increase the % of high risk locations who always provide Stronger Together leaflets and show video during induction by 5% (83% in Q1 2021) | Achieved (91%) |
| | Increase the % workers who state their Stronger Together initiative knowledge is good / excellent (70% in Q1 2021) | Not achieved (70% so no change) |
| Client co-operation: Improve the coordinated MDS activities conducted with clients | Increase the % risk locations who have put a structured MDS plan in place (62% in Q1 2021) | Not achieved, 61% have plan in place |
| Suppliers: Improve supplier MDS compliance through annual Supplier Questionnaire review / audit | Ensure a min of 50% of second tier agency suppliers are Stronger Together business partners | Not achieved (18% business partners, 68% engaged with Stronger Together initiative) |
| Compliance: Overall MDS process and controls | Improve the Gi Group score in the Stronger Together Good Practice Implementation Checklist by at least 5% | Achieved (from 78% to 86%) |

The main KPI / targets set for 2022 as part of the annual improvement plan are:

| KPI & Action | Target | Responsibility |
|---|--|---------------------------------|
| Identifying and addressing MDS concerns: Maintain a nonconformity tracker, completion of quarterly bank / address / NI checks, and worker surveys | Increase the volume of worker interviews by 10%, which will always include second tier workers where relevant (56 completed in 2021) | Compliance Dept |
| Training & Awareness: Quarterly ops staff training review, improvement of online module and ops manual content, and increases provision of information to candidates | Introduce the Worker Questionnaire at a min of 5 locations | Compliance Dept |
| | Increase the % workers who state their Stronger Together initiative knowledge is good / excellent (70% in 2021) | Compliance Dept |
| Client co-operation: Improve the coordinated MDS activities conducted with clients | Increase the % risk locations who have put a structured MDS plan in place (62% in Q1 2022) | Compliance Dept / Ops Employees |
| Suppliers: Improve supplier MDS compliance through annual Supplier Questionnaire review / audit | Ensure a min of 75% of second tier agency suppliers are engaged with the Stronger Together initiative | Compliance Dept / Ops Employees |
| Compliance: Overall MDS process and controls | Improve the Gi Group score in the Stronger Together Good Practice Implementation Checklist by at least 5% | Compliance Dept / Ops Employees |

REVIEW

Following its initial introduction, this Modern Day Slavery Statement will be reviewed by the Executive Management Team at least annually and may be reviewed from time to time.

This Policy is approved by the board of directors

Signed: Paulo Canoa – CEO, 31 March 2022

