

Modern Slavery and Human Trafficking Statement

1. Introduction

PeoplePlus has zero tolerance to slavery, human trafficking, and hidden labour exploitation, and is committed to ensuring that there is no modern slavery, human trafficking, or hidden labour exploitation in any part of our business.

This Modern Slavery and Human Trafficking Statement is the principal articulation of the PeoplePlus stance against slavery, human trafficking, and hidden labour exploitation. It is intended to inform and influence all operational procedures within the organisation.

Our Statement reflects our commitment to complying with all relevant legislation and regulations relating to modern slavery and human trafficking, including the UK Modern Slavery Act 2015, and acting ethically and with integrity in all our business relationships. Including implementing and enforcing effective systems, assessments, and controls to ensure (amongst our other priorities) that slavery, human trafficking, and hidden labour exploitation are not taking place anywhere in our business or related supply chains.

Given the nature of our business, the Senior Leadership Team considers that there is minimal risk within PeoplePlus and having assessed our supply chain using the Interactive Map for Business of Anti-Human Trafficking Organisations and internal assessments we believe this risk to be minimal throughout our supply chains that are in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking.

The employment and procurement practices operated by the businesses within PeoplePlus ensure that we are rightly viewed as an excellent and supportive employer, and to the extent that our organisation operates as a purchaser of goods or services, we expect a high level of ethical conduct from those businesses with which we do business within our supply chain.

This Statement sets out PeoplePlus' commitment to our entire workforce, to review, revise and prevent any impact to human rights throughout our supply chain.

PeoplePlus' policies and procedures are in line with the ILO indicators of forced labour and demonstrate our commitment to tackle forced labour and Human trafficking through our supply chain.

2. Definitions

'Modern Slavery' is a broad term used to encompass offences that involve one or more persons depriving another person(s) of their liberty, to exploit them for personal or commercial gain.

'Forced Labour' is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

'Debt-Bonded Labour' is where a person's labour is demanded as a means of repayment for a loan or service. Indicators of this are landlords linked to employment opportunities.

'Human Trafficking' is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

'Hidden Labour Exploitation' is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

3. PeoplePlus Commitments

All members of staff are required to attend appropriate modern slavery and human trafficking training as arranged by PeoplePlus.

PeoplePlus accepts that job-finding fees are a business cost and will not allow these to be paid by job applicants. We will not use any individual or organisation to source and supply candidates without confirming that candidates are not being charged a work finding fee.

PeoplePlus will ensure that all staff responsible for directly recruiting people are aware of the PeoplePlus Modern Slavery and Human Trafficking Policy and all associated policy documents.

PeoplePlus will ensure that labour sourcing, recruitment and contractor placement processes are under the control of trusted and competent staff members.

PeoplePlus will encourage and will support all employees to report cases of hidden labour exploitation or human trafficking if they are a victim or know anyone else that maybe a victim within their community. PeoplePlus shall commit that any information provided will be kept confidential and will be investigated appropriately and with sensitivity.

4. Organisation Structure

PeoplePlus is part of The Staffline Group which has 4 divisions: Staffline Recruitment GB, Datum RPO, PeoplePlus, and Staffline Recruitment Ireland. Brightwork operates in Scotland as a subsidiary of Staffline Recruitment GB, and Omega, Techsearch, and A La Carte operations are trading names of Staffline Recruitment GB.

For more information on the structure of Staffline Group Plc, please visit:

<https://www.stafflinegroupplc.co.uk/our-divisions/overview/>

We consult internal experts across the Staffline Group to ensure joint consensus in the approach to tackling modern slavery. As a wider organisation we are actively involved with NGO's and Anti-Slavery Networks across the country and review the Ethical Trading Initiatives evaluation framework, the ILO indicators of Modern Slavery and UN Guiding Principles when developing our Modern Slavery Statements.

PeoplePlus makes a positive difference to people's lives - every single day. Our committed teams work across Britain to deliver a range of public services, including support to find employment, online and in-person skills training, prison education, independent living, and self-employment advice. We also help employers grow through socially responsible recruitment and wellbeing solutions.

5. Our Supply Chain

Our partners are established public and private sector organisations that help us to deliver and maintain high quality job coaching, recruitment, and skills development services.

The aim of our partnerships is to join forces and expertise in offering a service that can seamlessly fit the needs and requirements of our service users and participants.

Promoting decent working conditions across our supply chain is part of our strategy to act in a sociable responsible manner. Establishing defined and clear standards of employment and working conditions in our supply chain and throughout our own company practices is key to ensure our workforce is protected, safe and valued.

We work with a variety of established partners who are committed to the same high standards. This is validated through our due diligence processes and for those organisations that meet the threshold of obligations under section 54 (1) of the Modern Slavery Act 2015 and we will support our partners to understand those obligations and statutory duties.

6. Commitment to Continuous Improvement

PeoplePlus is committed to working in conjunction with the Staffline Group to fight modern slavery and human trafficking; together we have a great deal of experience and work collaboratively with all of our clients and anti-slavery networks across the UK to share ideas and intelligence to work together to help eradicate modern slavery.

Any reports of modern slavery or human trafficking will be taken seriously and will be investigated promptly and thoroughly.

PeoplePlus will ensure that any recruitment staff or similar will be suitably trained and understand the risks and recognise any issues regarding modern slavery, hidden labour exploitation and modern slavery.

We understand that tackling modern slavery is an ongoing effort; we will regularly monitor and review our supply chain and practices and action accordingly to ensure we adapt and improve as appropriate to mitigate any risk of modern slavery or human trafficking at PeoplePlus.

PeoplePlus adopts a proactive approach to reporting any suspicions of modern slavery, human trafficking, or hidden labour exploitation to all relevant external authorities, including the Police, Gangmasters Labour Abuse Authority, etc. as appropriate. And all stakeholders are encouraged to report any concerns or suspicions of modern slavery or human trafficking in our business or supply chains to the appropriate reporting channels.

PeoplePlus requires all organisations in our supply chain to acknowledge and understand the risks and issues regarding modern slavery, human trafficking, and hidden labour exploitation, and adopt their own policies and procedures that are consistent with our approach.

We are committed to continuously improving our efforts to prevent modern slavery and human trafficking and to complying with all relevant laws and regulations.

7. Due Diligence

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures in the following areas: Anti-Bribery and Corruption, Anti-Money Laundering, Partner Management Framework (Design and Review), Consultancy, Whistleblowing, Recruitment, Safeguarding, and Equality and Diversity.

PeoplePlus articulates a series of employee rights and benefits available to employees during the employee Inductions and Welcome Events and individual contracts of employment for each member of staff.

We understand that organisations can have a profound impact on employee conditions in their supply chains through their purchasing practices, and we carefully consider this at all stages of our design and procurement processes. Certain purchasing practices can unintentionally put pressure on suppliers leading to poor recruitment practices, worker conditions and low pay for employees. Some examples of purchasing practices that could create these conditions include aggressive pricing that does not consider sustainable production costs, short lead times, late high-volume orders, inaccurate forecasting, late or extended payments, withdrawing from contracts last minute, unfair penalties for not meeting orders despite last minute changes, and accuracy of technical specifications.

Due diligence checks undertaken by PeoplePlus consider the extent to which there are appropriate policies and procedures in place within our supply chain to ensure that their employees are not trapped in debt bondage. Some indirect methods of recruitment can provide an avenue for modern slavery, due to the absence of oversight and governance by the receipt organisation.

We are undertaking reviews on suppliers to PeoplePlus to ensure they share the same aims and standards that we hold in such high regard. We actively support these organisations in every way we can, and our reviews include an assessment based on risk. This approach stems from the Government's Modern Slavery Assessment Tool ('MSAT'), which enables us to identify and implement applicable scoring and assessment criteria. Where appropriate, a development plan will be implemented with suppliers, with supporting implementation plans and review schedules.

Potential suppliers (which includes recruitment providers/agencies) to PeoplePlus may not pass the due diligence screening process if there are insufficient or substandard policies and processes in place within the organisation being reviewed. Further, existing suppliers to PeoplePlus may be subject to de-listing in the event of any modern slavery issues being identified at any time.

PeoplePlus is an ISO 9001 certified business. Our policy management is consistent and comprehensive, and we have a suite of policies relating to human rights, modern slavery, human trafficking, including recruitment practices.

8. Training & Access to Support

We will communicate this Statement to our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and will include references as part of our training, induction, and information materials.

Training and awareness materials are readily available to all permanent members of staff so that their continuous professional development can be supported; training topics include safeguarding, whistleblowing, reporting on incidents, raised awareness and understanding the risks of debt bondage, and how to spot the signs of modern slavery and human trafficking.

Our internal policy documents and communication materials help our employees understand how to access the Modern Slavery Helpline, and other external sources of support and advice (including our independent whistleblowing service).

PeoplePlus provides support for its supply chain and access to policy and training materials where appropriate. Members of the Staffline Group investigations team also provide workshop sessions to discuss their learned experiences through dealing with cases and supporting potential and actual victims of trafficking and/or exploitation.

9. Measuring Effectiveness and Key Performance Indicators

We believe that you can never stop learning about the crime of modern slavery, although there are many more tools out there to engage with to help every business, it is an ever-evolving cycle.

Experience shows that the traffickers change their methods, the crime is hidden and not always easy to spot, and with various obstacles that we have all overcome in the last few years, including the pandemic, modern slavery is still prevalent.

We continuously review our investigative ways of working, take the time needed after every case that we are either involved in, or hear about and review and reflect, finding ways to improve our processes and practices.

Year on year, we learn more, develop and strengthen our processes, and engage with more partners building more and more relationships to help spread the messaging and do everything we possibly can to help prevent Modern Slavery in our supply chains.

To measure our impact this year we will:

- **Supplier Engagement:** Ensure that 100% of suppliers onboarded successfully meet our due diligence criteria and requirements, and that on-going support and guidance is made available.
- **Training and Awareness:** Log the number of employees accessing modern slavery training/awareness materials.
- **Investigations:** Record the number of incidents and investigations conducted into reported cases of modern slavery, including internal and external investigations.

10. Risk Assessments and Management

At PeoplePlus, we understand that at times we will engage with other recruitment partners through our Social Recruitment Framework and elsewhere to assist with the supply of candidates to our clients.

Within our recruitment businesses, we use GLAA licenced agencies, and audit them annually and check that they are all committed to preventing modern slavery and have the right level of due diligence checks in place. Staffline Group is an active member of the Compliance Intelligence Network allows us to liaise with other like-minded businesses.

Most cases involve welfare checks and interviews, ensuring that we learn how we can improve our checks and make them more robust is fundamental. This in turn allows the Compliance intelligence Network to share to broader groups to help the wider industry.

We have assessed our risk as low utilising the Interactive Map for Business of Anti-Human Trafficking Organisations and internal assessments. This will be continuously monitored to identify any new potential risks.

To fulfil our commitment, and as detailed elsewhere within this document, we will:

- Conduct due diligence to identify and assess potential modern slavery risks in our operations and supply chains.
- Take appropriate action to address any identified risks and work with our suppliers and partners to improve their practices.
- Provide access to training materials and collateral to increase awareness of modern slavery and how to identify and report any potential cases.
- Encourage and support the reporting of any suspected cases of modern slavery and human trafficking.
- Using the experienced investigations team from within the Staffline Group, ensure that all suspected/actual cases of Modern Slavery are carefully and thoroughly investigated with an appropriate conclusion, and ensure that the follow-up actions to support any actual or suspected victims of trafficking and/or exploitation are progressed as priority.
- Regularly review and monitor our policies and practices to ensure that they remain effective in preventing modern slavery and human trafficking.

11. Communication & Collaboration

We communicate regularly with our suppliers, funders, and stakeholders to ensure that they are aware of our commitment to preventing Modern Slavery and human trafficking within our business. We will work collaboratively with them to identify and address any risks and to share best practices, and the investigations team from our Parent Company often spends time with HR and management teams outside of the business to help with wider awareness and the application of effective processes and support arrangements.

Our Governance Director has completed the Stronger Together Advanced Tackling Modern Slavery in UK Businesses course and completed the Labour Provider/Recruitment Business Good Practice Implementation Checklist, whilst also accessing and promoting the wealth of Stronger Together training and tools available.

12. Governance and Oversight

We have established governance and oversight mechanisms to ensure that our policies and procedures are effectively implemented, and to monitor our performance in preventing modern slavery and human trafficking.

Our Governance Director is responsible for ensuring compliance with our Modern Slavery Statement and to oversee the implementation of our policies and procedures.

All PeoplePlus policies reflect the principles of protecting the welfare of our employees, and for the employees within our supply chains. Looking after wellbeing is at the core of our business and reflected within all

processes and management arrangements.

We constantly improve our processes to strengthen them and implement new checks as soon as we hear new learnings of how traffickers are evolving and learning new ways to infiltrate businesses like ours and those around us.

PeoplePlus maintains a centralised repository of company policies, ensuring all our staff have access to and visibility of company policies. We regularly review and communicate, via multiple digital methods, policy updates and company principles. Our internal reviews implement continuous improvement plans including updating our Modern Slavery Statement to comply with the UK Government statutory guidance to cover six key pillars and driving effective change to continue to tackle modern slavery across our business.

13. Future Plans

We are committed to continuously improving our approach to preventing Modern Slavery and Human Trafficking in our business, and we have developed an action plan which considers the priorities documented herein, and any feedback that we have received from any feedback provided by the Department for Work and Pensions.

PeoplePlus regularly reviews its policies and procedures and takes appropriate action to address any identified risks or areas for improvement.

We continue with this aim in mind to increase awareness across our business and supply chain, with a hope that team members will be more confident to report in any exploitative practices either they experience themselves or on behalf of others being subjected to these.

At PeoplePlus, we place great importance on the role we play in helping to support local communities and the environment surrounding us, and our overarching strategy is articulated within our ESG report which is published annually.

We believe that ESG should not be a standalone compliance exercise. We recognise the importance of ensuring our ESG objectives are aligned to our corporate and governance strategies, which includes our commitment to tackling modern slavery and hidden labour exploitation within our own business, and with those with whom we work.

Our ESG Committee representatives have extensive knowledge of the Staffline Group Plc and each of the businesses within it to ensure our ESG strategy is linked to our wider business strategy and remains industry relevant. Our ESG report can be found here:

https://www.stafflinegroupplc.co.uk/media/1395/43800-staffline_esg23_final.pdf

14. Legal and Regulatory Purpose of this Statement

This statement is made with regard to the obligations under section 54(1) of the UK's Modern Slavery Act 2015 (the Act). Accordingly, this statement should be considered to constitute the Modern Slavery and Human Trafficking Statement for PeoplePlus for the 2024-2025 period until it may in future be modified or amended.

This statement was approved by the Group Managing Director and Board of Directors of PeoplePlus Group Limited in May 2024.



Kenny Boyle
Group Managing Director



Steven Bell
Governance Director