

MODERN SLAVERY STATEMENT

Michael Page International Recruitment Limited's purpose is to change lives for people through creating opportunity to reach potential. We are therefore fully committed to preventing acts of modern slavery and human trafficking from occurring within our business and the supply chain.

Our Employee and Supplier Code of Conduct make clear that we expect our own people and everyone employed by our suppliers, whether permanent or temporary, to be treated with respect and dignity at work and we believe employment should always be chosen. There must be no forced, bonded or involuntary labour. Employees must not be required to lodge monies or identity papers to be able to work and must be free to leave employment after the giving of reasonable notice.

We are publishing this statement to explain the actions we have taken to mitigate modern slavery within our supply chain and the steps we intend to take over the coming year.

Kelvin Stagg
Director

4 September 2020

Michael Page International Recruitment Limited

Michael Page International Recruitment Limited (“the Company”) is a specialist recruitment consultancy and the main UK trading company of the PageGroup plc group of companies who trade under the core brands of PAGEGROUP, PAGE EXECUTIVE, MICHAEL PAGE, PAGE PERSONNEL and PAGE OUTSOURCING. The company has c. 1,400 employees operating in the UK, with annual revenue of c. £313m.

Our Supply Chain

As a provider of recruitment services we consider our supply chain to be relatively simple in comparison to many other industries.

We work with a small range of suppliers who provide services across a number of different categories, such as property and facilities management, IT and telecoms, marketing, legal and other services. Therefore, we have close relationships with our suppliers and good visibility of our supply chain.

Risk and Compliance

The nature and extent of the Company’s exposure to the risk of modern slavery occurring in the supply chain is assessed through the Internal Audit Function and Procurement Teams. As our core business is focused on the provision of recruitment services in respect of professionals, office and administrative workers (rather than in relation to agriculture, retail or manufacturing, which are sectors we perceive to present a higher risk of labour exploitation and modern slavery), we do not consider that we operate in a particularly high risk sector. This evaluation process continues on an annual basis.

Our Policy on Modern Slavery and Human Trafficking

Our Employees are required to comply with our Employee Code of Conduct and our Suppliers with our Supplier Code of Conduct.

These policies reflect our commitment to acting ethically and with integrity in our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our business and supply chain.

Due Diligence Processes for Slavery and Human Trafficking

Our Own Business

The Company prohibits the use of all forms of forced labour and any form of human trafficking as set out in the Employee Code of Conduct. We have a number of procedures in place in relation to our employees to proactively manage any risk, including robust recruitment processes in line with employment laws and a confidential third party operated “Speak-Up” helpline which employees are encouraged to use to report any concerns.

As part of our own business we supply temporary personnel to a number of clients. We take our obligations seriously in this respect and have well established and audited procedures to ensure that those temporary workers are protected from the risks of modern slavery. We ensure that temporary workers:

- have a right to work the duration of their assignment. This involves asking the individual directly to view their relevant identity documentation. A delay in providing proof of identity and/or associated right to work documentation might indicate a modern slavery issue and would be escalated appropriately;
- take relevant references to ensure the individual is hired in a role that they have both the qualifications and experience to undertake;
- we carry out detailed background checks and ensure all contracts comply with all legal requirements regarding workers' rights;
- where we provide payroll services as required by our own clients, we check that such temporary personnel have a bank account in their own name into which their remuneration is paid;
- where we are responsible for such temporary personnel while they are on assignment on our client's premises, they are always free to leave their assignment; and
- receive compliant pay as determined by the Agency Workers Regulations 2011.

In addition, our employees, through the Employee Code of Conduct, are made aware of the requirement for employees to support and uphold human rights principles and know that the Company will not tolerate, engage in or support the use of, forced labour.

Our Supply Chain

We map and risk assess our tier 1 suppliers who provide goods and services directly to our business. We include due diligence queries in RFP processes to identify our potential suppliers' approach to modern slavery and these assist in our determination of whether the supplier should be considered a high risk supplier. A high risk supplier is sent a questionnaire so we can further assess their approach to the issue of modern slavery.

Supplier contracts contain anti-modern slavery clauses which place an obligation on suppliers to comply with the Modern Slavery Act 2015 and rights of audit to help us identify unethical practices. If we were to find evidence that one of our suppliers has failed to comply with the Modern Slavery Act 2015 then we would require the relevant supplier to remedy such non-compliance or we would terminate our relationship with the supplier.

This approach is designed to:

- identify and assess potential risk areas in our UK supply chain;
- mitigate the risk of slavery and human trafficking occurring in the supply chain;
- monitor potential risk areas in the supply chain; and
- provide adequate protection to whistle blowers.

In the last 12 months, a Working Group comprised of senior leaders from the Legal, Procurement and Facilities functions has been established. This Working Group meets to discuss the actions being taken in respect of the business's anti-modern slavery strategy. Guidance, training and support on modern slavery matters is also provided to the facilities and procurement teams by running externally facilitated training to help identify any modern slavery issues.

Further Steps

Following a review of the effectiveness of the steps taken in the previous financial year to prevent modern slavery or human trafficking occurring in our business and supply chain, we intend to take the following further steps during the course of the 2020 financial year:

- we will engage with high risk suppliers to ensure awareness of our “Speak-Up” helpline for their employees; and
- implement a defined set of KPIs relating to: number of upheld complaints (we have a zero tolerance approach) and in respect of high risk suppliers providing services to our business, % of tier 1 suppliers mapped and risk assessed and % of engagement and/or audits carried out regarding modern slavery compliance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 is reviewed and adopted by the Board and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2019.

Kelvin Stagg

Date: 4 September 2020