

MICHAEL PAGE INTERNATIONAL RECRUITMENT LIMITED

MODERN SLAVERY STATEMENT

At Michael Page International Recruitment Limited we believe in the importance of equality in the workplace. Being a responsible corporate citizen is not only the right thing to do, it is good for the long term viability of our business.

As a member of the PageGroup plc group of companies, we have an established [Employee Code of Conduct](#) which sets out the standards by which we operate. We expect these same high standards from our suppliers and we are committed to preventing acts of modern slavery and human trafficking from occurring within our business and the supply chain.

We implement the PageGroup Supplier Code of Conduct which makes it clear that we expect the staff employed by our suppliers, whether permanent or temporary, to have the same basic right to be treated with respect and dignity at work as our own employees. We believe employment should be chosen. There must be no forced, bonded or involuntary labour. Supplier employees must not be required to lodge monies or identity papers in order to work and must be free to leave employment after the giving of reasonable notice.

We are publishing this statement to explain the work we have completed to date to combat modern slavery within our business and the steps we intend to take over the coming year.

A handwritten signature in black ink, appearing to read 'K. Stagg', written over a horizontal line.

Kelvin Stagg
Director

Background

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 PAGE EXECUTIVE, MICHAEL PAGE, PAGE PERSONNEL and PAGE OUTSOURCING. The Company has c.1,400 employees operating in the UK, with annual revenue of £312m (2017).

Our Supply Chain

As a UK 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 goods and 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.

Having performed a risk assessment of our supply chain we consider that there is a relatively low risk of labour exploitation or other forms of slavery and human trafficking occurring within it. Nevertheless, we are committed to preventing these practices from occurring within both our business and supply chain, which is demonstrated by our policies and due diligence procedures as outlined below.

Our Policy on Modern Slavery and Human Trafficking

Our suppliers are required to comply with the PageGroup Employee Code of Conduct (which also applies to all employees of the Company) and with the PageGroup 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 UK 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. 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 UK employment laws and a whistleblowing 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. In this respect we have established and audited procedures to ensure that those employees:-

- have a right to work in the UK. This involves asking the individual directly to view their passport. A delay in providing the passport might indicate a modern slavery issue;

- 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; and
- where we are responsible for such temporary personnel whilst they are employed on our client's premises, they are free to leave their assignment on reasonable notice.
- in addition, our employees, through the Employee Code of Conduct, are made aware of the Company's requirement for employees to support and uphold human rights principles and know that PageGroup will not tolerate, engage in or support the use of, forced labour.

Our Supply Chain

As part of our initiative to identify, monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, we have undertaken the following due diligence procedures:-

(a) we have completed the mapping of our tier 1 suppliers who provide goods and services direct to our business;

(b) we have assessed each of those suppliers in our supply chain and ranked each as either a high, medium or low risk (relative to what we perceive to be the risk generally to our supply chain);

(c) we wrote to all our suppliers to note our commitment to transparency and combatting modern slavery within our own organisation and our similar expectation from suppliers of goods and services to us, sending each supplier our Supplier Code of Conduct and requesting a signed confirmation from those suppliers that they adhere to our required standards;

(d) in addition, each supplier that we ranked as a high risk has been sent a questionnaire so we can further assess their approach to the issue of modern slavery;

(e) we have reserved the right with our all suppliers to request access to their facilities for members of our Internal Audit Team to check compliance with our Supplier Code of Conduct. Such on-site audits would also help us to identify whether a supplier was engaged in unethical practices, which might include forced labour or other forms of modern slavery;

(f) we have updated our terms and conditions with our key suppliers to include anti-modern slavery clauses which place an obligation on suppliers to comply with the Modern Slavery Act 2015; and

(g) key members of our Procurement Team have received training on the issue of modern slavery.

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 and we would consider terminating our relationship should we see no improvement in the way their business is conducted.

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.

Risk and Compliance

The Company has evaluated the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain through the PageGroup Internal Audit Function in combination with the Procurement Team. Since 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, being sectors we perceive to present a higher risk of labour exploitation and modern slavery), we do not consider that we operate in a high risk sector. This evaluation process will continue on an annual basis.

Training and Performance Indicators

Given our view that the Company's exposure to modern slavery risk is limited, and the existing due diligence processes we already have in place as an organisation, except as noted above, we have not implemented additional specific training of our general employee population or included key performance indicators in relation to modern slavery and human trafficking during the previous financial year.

Further Steps

Following a review of the effectiveness of the steps taken to prevent modern slavery or human trafficking occurring in our business and UK supply chain, we intend taking the following further steps to combat slavery and human trafficking during the course of the 2019 financial year:

- continue to monitor the risk to our UK supply chain on an ongoing basis;
- implement specific training of all UK based employees to ensure a high level of understanding of the risks of modern slavery and so they are aware of what to look out for in respect of modern slavery; and

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2018.

Kelvin Stagg, Director
Michael Page International Recruitment Limited