Executive Owner | Chief Executive Officer
--- | ---
Policy Owner | Group Operations Manager
Approval & Sign off | Senior Management Team / Head of Legal
Version | 4.1
Date | November 2019
Next Review date | Q3 2020
Associated Policies / Documents | Anti-Bribery and Corruption Policy
| Anti Fraud Policy
| Anti-Money Laundering Policy
| Complaints Handling Policy
| Corporate Social Responsibility Policy
| Dignity at Work Policy
| Modern Slavery Act Policy
| Whistle Blowing Procedure

Introduction from the CEO

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 freedoms and rights.

Sanderson Solutions Group PLC and its subsidiaries (together “Sanderson Group”) are totally opposed to such abuses in all our operations whether direct, indirect and in our supply chain as a whole. 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 our supply chains. It is our policy to conduct all of our business in an honest and ethical manner.

Our Business

Sanderson Group are providers of permanent and non-permanent resource, offering a full breadth of individually tailored and professional recruitment solutions to multi-nationals, household names and SMEs. Sanderson Group has operations in the UK, Ireland and Northern Europe.

Sanderson Group undertakes checks in relation to all candidates who we introduce to clients to ensure that we clearly establish their identity. For individuals this includes checking documentation such as their passport, relevant utility bills and right to work documentation. For limited companies this includes checking documentation around their incorporation, insurance and VAT status.

Sanderson Group Subsidiaries

Amber Resourcing Limited
Fuse Recruitment Limited
Intelligent Resource Limited
ITF Solutions Limited

Modern Slavery Act Transparency Statement © Sanderson Oct-19
Our Supply Chains

Our supply chains include the sourcing of candidates for onward supply to clients. Any recruitment agencies that introduce candidates for onward supply to our clients are either known to us via existing long-term partnerships or are agencies on our preferred supplier list and are subject to due diligence checks at the outset of engagement within the Sanderson Group.

Where the Sanderson Group engage with an umbrella company (i.e. a company that employs contractors to work on temporary contract assignments), for the supply of a contractor, such company will undergo stringent due diligence checks at the outset of engagement within the Sanderson Group, which includes ensuring solutions offered by the umbrella company are legally compliant, further to all local laws. If the outcome of such due diligence checks is satisfactory, the umbrella company will be included on our preferred supplier list which is freely available to candidates who are looking to become contractors via the Sanderson Group. The preferred supplier list is continually monitored to ensure continuing standards required by the Sanderson Group are met.

Where the Sanderson Group engage with a limited company of which the candidate is a director, for the supply of the candidate as a contractor, such company again undergoes stringent due diligence checks at the outset of engagement within the Sanderson Group.

As with all suppliers, they may be subject to additional due diligence checks depending on the contractual relationship and supply chain specific requirements.

The Sanderson Group are members of both the Recruitment and Employment Confederation (“REC”) and the Association of Professional Staffing Companies (“APSCo”) in the United Kingdom and where practicable, we look for recruitment organisations and umbrella companies we work with to hold membership or an affiliation with REC and/or APSCo.

Relevant Policies

The Sanderson Group are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Act Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Other relevant policies include:

- Anti-Bribery and Corruption Policy
- Anti Fraud Policy
- Anti-Money Laundering Policy
- Complaints Handling Policy
Our policies and Staff Handbook set out the behaviours we expect from our employees in their dealings with colleagues, customers, suppliers, agents, intermediaries, advisers etc. All employees are expected to act with integrity in accordance with the standards of behaviour set out in the Staff Handbook.

We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions; we encourage employees to raise any concerns.

**Due Diligence Processes for Slavery and Human Trafficking**

We consider that the greatest risk of slavery and human trafficking may be in our supply chain where operations and managerial oversight are out of our direct control. We have been looking at our due diligence process and engagement with our suppliers, and have made and continue to make a number of changes to strengthen and enhance the protections we have in place. These include, where appropriate:

- carrying out an assessment of any new suppliers to identify any areas of concern;
- either carrying out ourselves or requiring our suppliers to carry out, enhanced vetting of employees;
- restricting the right of our suppliers to sub-contract services and, where it is permitted, making such sub-contracting subject to our prior approval;
- reviewing our contractual terms and, where necessary, adding in anti-slavery compliance wording further to the Modern Slavery Act;
- strengthening our contractual audit rights;
- preferred supplier lists.

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

Staff, contractors or other parties are strongly encouraged to report any concerns or suspicions that they might have to the Group Operations Manager.

Reports surrounding these issues are taken extremely seriously by our board of directors, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:

- working with the appropriate organisations to improve standards;
- removing that organisation from our preferred supplier list; and
- passing details to appropriate law enforcement bodies.

**Monitoring and Compliance**

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

- training to all employees;
- monitoring of reported complaints; and
- a level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

The Group Operations Manager is ultimately responsible for compliance throughout the Sanderson Group.
This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes the Sanderson Group's slavery and human trafficking statement for the financial year ended 30 June 2019, and applies to Sanderson Solutions Group PLC and all its subsidiaries.

Mike Beesley  
CEO  
Sanderson Solutions Group PLC

Version & Review History:

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Comments</th>
<th>Author</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>31/05/16</td>
<td>New policy</td>
<td>Karen Ainsworth-Smith, Legal Services</td>
</tr>
<tr>
<td>2.1</td>
<td>20/09/17</td>
<td>Policy Update</td>
<td>Karen Ainsworth-Smith, Legal Services</td>
</tr>
<tr>
<td>3.1</td>
<td>24/10/18</td>
<td>Policy Update</td>
<td>Karen Ainsworth-Smith, Legal Services</td>
</tr>
<tr>
<td>3.2</td>
<td>02/05/19</td>
<td>Inclusion of RSG subsidiaries</td>
<td>Karen Ainsworth-Smith, Legal Services</td>
</tr>
<tr>
<td>4.1</td>
<td>25/11/19</td>
<td>Policy Update</td>
<td>Karen Ainsworth-Smith, Legal Services</td>
</tr>
</tbody>
</table>
Modern Slavery Act – Transparency Statement

October 2018
Executive Owner: Chief Executive Officer
Policy Owner: Group Operations Manager
Approval & Sign off: Senior Management Team, Head of Legal
Version: 3.1
Date: October 2018
Next Review date: Q3 2019

Associated Policies / Documents:
- Anti-Bribery and Corruption Policy
- Anti Fraud Policy
- Anti-Money Laundering Policy
- Complaints Handling Policy
- Corporate Social Responsibility Policy
- Dignity at Work Policy
- Modern Slavery Act Policy
- Whistle Blowing Procedure

Introduction from the CEO
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 freedoms and rights.

Resource Solutions Group PLC and its subsidiaries (together "RSG") are totally opposed to such abuses in all our operations whether direct, indirect and in our supply chain as a whole. 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 our supply chains. It is our policy to conduct all of our business in an honest and ethical manner.

Our Business
RSG are providers of permanent and non-permanent resource, offering a full breadth of individually tailored and professional recruitment solutions to multi-nationals, household names and SMEs. RSG has operations in the UK, Ireland and Northern Europe.

RSG undertakes checks in relation to all candidates who we introduce to clients to ensure that we clearly establish their identity. For individuals this includes checking documentation such as their passport, relevant utility bills and right to work documentation. For limited companies this includes checking documentation around their incorporation, insurance and VAT status.

Our Supply Chains
Our supply chains include the sourcing of candidates for onward supply to clients. Any agencies that introduce candidates for onward supply to our clients are either known to us via existing long-term partnerships or are agencies on our preferred supplier list.

We are members of both the Recruitment and Employment Confederation ("REC") and the Association of Professional Staffing Companies ("APSCo") in the United Kingdom and where practicable, we look for recruitment organisations we work with to hold membership with REC and/or APSCo.

Relevant Policies
We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Act Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
Other relevant policies include:-
- Anti-Bribery and Corruption Policy
- Anti Fraud Policy
- Anti-Money Laundering Policy
- Complaints Handling Policy
- Corporate Social Responsibility
- Dignity at Work Policy
- Whistle Blowing Procedure

Our policies and Staff Handbook set out the behaviours we expect from our employees in their dealings with colleagues, customers, suppliers, agents, intermediaries, advisers etc. All employees are expected to act with integrity in accordance with the standards of behaviour set out in the Staff Handbook.

We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions; we encourage employees to raise any concerns.

**Due Diligence Processes for Slavery and Human Trafficking**

We consider that the greatest risk of slavery and human trafficking may be in our supply chain where operations and managerial oversight are out of our direct control. We have been looking at our due diligence process and engagement with our suppliers, and have made a number of changes to strengthen and enhance the protections we have in place. These include, where appropriate:

- carrying out an assessment of any new suppliers to identify any areas of concern;
- either carrying out ourselves or requiring our suppliers to carry out, enhanced vetting of employees;
- restricting the right of our suppliers to sub-contract services and, where it is permitted, making such sub-contracting subject to our prior approval;
- reviewing our contractual terms and, where necessary, adding in anti-slavery compliance wording further to the Modern Slavery Act; and
- strengthening our contractual audit rights.

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

Staff, contractors or other parties are strongly encouraged to report any concerns or suspicions that they might have to the Group Operations Manager.

Reports surrounding these issues are taken extremely seriously by our board of directors, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:

- working with the appropriate organisations to improve standards;
- removing that organisation from our preferred supplier list; and
- passing details to appropriate law enforcement bodies.

**Monitoring and Compliance**

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

- Training to all employees
- Monitoring of reported 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.

The Group Operations Manager is ultimately responsible for compliance throughout RSG.
This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes RSG's slavery and human trafficking statement for the financial year ended 30 June 2018, and applies to Resource Solutions Group PLC and all its subsidiaries.

Mike Beesley
CEO
Resource Solutions Group PLC

Version & Review History:

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Comments</th>
<th>Author</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>31/05/16</td>
<td>New policy</td>
<td>Karen Ainsworth-Smith, Legal Services</td>
</tr>
<tr>
<td>2.1</td>
<td>20/09/17</td>
<td>Policy Update</td>
<td>Karen Ainsworth-Smith, Legal Services</td>
</tr>
<tr>
<td>3.1</td>
<td>24/10/18</td>
<td>Policy Update</td>
<td>Karen Ainsworth-Smith, Legal Services</td>
</tr>
</tbody>
</table>
Modern Slavery Act – Transparency Statement

September 2017
<table>
<thead>
<tr>
<th>Executive Owner</th>
<th>Chief Executive Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Owner</td>
<td>Head of Compliance</td>
</tr>
<tr>
<td>Approval &amp; Sign off</td>
<td>Senior Management Team</td>
</tr>
<tr>
<td></td>
<td>Head of Legal</td>
</tr>
<tr>
<td>Version</td>
<td>2.1</td>
</tr>
<tr>
<td>Date</td>
<td>September 2017</td>
</tr>
<tr>
<td>Next Review date</td>
<td>Q2 2018</td>
</tr>
<tr>
<td>Associated Policies / Documents</td>
<td>Anti-Bribery and Corruption Policy</td>
</tr>
<tr>
<td></td>
<td>Anti Fraud Policy</td>
</tr>
<tr>
<td></td>
<td>Anti-Money Laundering Policy</td>
</tr>
<tr>
<td></td>
<td>Complaints Handling Policy</td>
</tr>
<tr>
<td></td>
<td>Corporate Social Responsibility Policy</td>
</tr>
<tr>
<td></td>
<td>Dignity at Work Policy</td>
</tr>
<tr>
<td></td>
<td>Modern Slavery Act Policy</td>
</tr>
<tr>
<td></td>
<td>Whistle Blowing Procedure</td>
</tr>
</tbody>
</table>

**Introduction from the CEO**

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 freedoms and rights.

Resource Solutions Group PLC and its subsidiaries (together "RSG") are totally opposed to such abuses in all our operations whether direct, indirect and in our supply chain as a whole. 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 our supply chains. It is our policy to conduct all of our business in an honest and ethical manner.

**Our Business**

RSG are providers of permanent and non-permanent resource, offering a full breadth of individually tailored and professional recruitment solutions to multi-nationals, household names and SMEs. RSG has operations in the UK, Ireland and Northern Europe.

RSG undertakes checks in relation to all candidates who we introduce to clients to ensure that we clearly establish their identity. For individuals this includes checking documentation such as their passport, relevant utility bills and right to work documentation. For limited companies this includes checking documentation around their incorporation, insurance and VAT status.

**Our Supply Chains**

Our supply chains include the sourcing of candidates for onward supply to clients. Any agencies that introduce candidates for onward supply to our clients are either known to us via existing long-term partnerships or are agencies on our preferred supplier list.

We are members of both the Recruitment and Employment Confederation ("REC") and the Association of Professional Staffing Companies ("APSCo") in the United Kingdom and where practicable, we look for recruitment organisations we work with to hold membership with REC and/or APSCo.

**Relevant Policies**

We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Act Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
Other relevant policies include:-
- Anti-Bribery and Corruption Policy
- Anti Fraud Policy
- Anti-Money Laundering Policy
- Complaints Handling Policy
- Corporate Social Responsibility
- Dignity at Work Policy
- Whistle Blowing Procedure

Our policies and Staff Handbook set out the behaviours we expect from our employees in their dealings with colleagues, customers, suppliers, agents, intermediaries, advisers etc. All employees are expected to act with integrity in accordance with the standards of behaviour set out in the Staff Handbook.

We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions; we encourage employees to raise any concerns.

Due Diligence Processes for Slavery and Human Trafficking
We consider that the greatest risk of slavery and human trafficking may be in our supply chain where operations and managerial oversight are out of our direct control. We have been looking at our due diligence process and engagement with our suppliers, and have made a number of changes to strengthen and enhance the protections we have in place. These include, where appropriate:

- carrying out an assessment of any new suppliers to identify any areas of concern;
- either carrying out ourselves or requiring our suppliers to carry out, enhanced vetting of employees;
- restricting the right of our suppliers to sub-contract services and, where it is permitted, making such sub-contracting subject to our prior approval;
- reviewing our contractual terms and, where necessary, adding in anti-slavery compliance wording further to the Modern Slavery Act; and
- strengthening our contractual audit rights.

We have zero tolerance to slavery and human trafficking and expect all those in our supply chain, and contractors, to comply with our values. Wherever possible we build long standing relationships with local 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, to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Training to all employees
- Monitoring of reported 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.

The Head of Compliance is ultimately responsible for compliance throughout RSG.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes RSG's slavery and human trafficking statement for the financial year ended 30 June 2017, and applies to Resource Solutions Group PLC and all its subsidiaries.

Mike Beesley
CEO
Resource Solutions Group PLC
<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Comments</th>
<th>Author</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>31/05/16</td>
<td>New policy</td>
<td>Karen Ainsworth-Smith; Legal Services</td>
</tr>
<tr>
<td>2.1</td>
<td>20/09/17</td>
<td>Policy Update</td>
<td>Karen Ainsworth-Smith; Legal Services</td>
</tr>
</tbody>
</table>
Modern Slavery Act – Transparency Statement

May 2016
Executive Owner | Chief Executive Officer
---|---
Policy Owner | Head of Compliance
Approval & Sign off | Senior Management Team Head of Legal
Version | 1.1
Date | May 2016
Next Review date | Q2 2017

Introduction from the CEO
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 freedoms and rights.

Resource Solutions Group Plc and its subsidiaries (together "RSG") are totally opposed to such abuses in all our operations whether direct, indirect and in our supply chain as a whole. 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 our supply chains. It is our policy to conduct all of our business in an honest and ethical manner.

Our Business
RSG are providers of permanent and non-permanent resource, offering a full breadth of individually tailored and professional recruitment solutions to multi-nationals, household names and SMEs. RSG has operations in the UK, Ireland and Northern Europe.

RSG undertakes checks in relation to all candidates who we introduce to clients to ensure that we clearly establish their identity. For individuals this includes checking documentation such as their passport, relevant utility bills and right to work documentation. For limited companies this includes checking documentation around their incorporation, insurance and VAT status.

Our Supply Chains
Our supply chains include the sourcing of candidates for onward supply to clients. Any agencies that introduce candidates for onward supply to our clients are either known to us via existing long-term partnerships or are agencies on our preferred supplier list.

We are members of both the Recruitment and Employment Confederation ("REC") and the Association of Professional Staffing Companies ("APScCo") in the United Kingdom and where practicable, we look for recruitment organisations we work with to hold membership with REC and/or APScCo.
Relevant Policies
We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Act Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our relevant policies include:-
- Anti-Bribery and Corruption Policy
- Anti Fraud Policy
- Anti-Money Laundering Policy
- RSG Complaints Handling Policy
- Corporate Social Responsibility
- Dignity at Work Policy
- Whistle Blowing Procedure

Our policies and Staff Handbook set out the behaviours we expect from employees in their dealings with colleagues, customers, suppliers, agents, intermediaries, advisers etc. All employees are expected to act with integrity in accordance with the standards of behaviour set out in the Staff Handbook.

We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions; we encourage employees to raise concerns.

Due Diligence Processes for Slavery and Human Trafficking
We consider that the greatest risk of slavery and human trafficking may be in our supply chain where operations and managerial oversight are out of our direct control. We are in the process of reviewing our procurement process and all future procurement activities will incorporate a requirement to demonstrate compliance with the Modern Slavery Act.

We have zero tolerance to slavery and human trafficking and expect all those in our supply chain, and contractors, to comply with our values. Wherever possible we build long standing relationships with local 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, to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Training to all employees
- Monitoring of reported 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.

The Head of Compliance is ultimately responsible for compliance throughout RSG.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes RSG’s slavery and human trafficking statement for financial year 2015 / 2016.

Mike Beesley
CEO
Resource Solutions Group PLC

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Comments</th>
<th>Author</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>31/05/16</td>
<td>New policy</td>
<td>Karen Ainsworth-Smith, Legal Services</td>
</tr>
</tbody>
</table>