

**Modern Slavery  
Act  
Transparency  
Statement**

Document Ref	Document Name	Version No.
LEGST01	Modern Slavery Act Transparency Statement	9.2
Document Owner	Executive Owner	Doc Control Approval Date
Legal Team	Group Head of Legal	December 2025
Document Data Classification		
Public	Confidential	Restricted

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## **1. INTRODUCTION FROM THE CEO**

1.1.1.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.

1.1.2.Sanderson Solutions Group Plc and its subsidiaries (together “Sanderson Group”, “our”, “we”) are totally op- posed 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.

## **2. OUR BUSINESS**

2.1.1.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. This Transparency Statement covers Sanderson Group’s operations in the UK and Ireland.

2.1.2.Sanderson Group undertakes checks in relation to all registered candidates introduced to clients to ensure candidates’ identity is clearly established. This includes checking documentation such as their right to work documentation and recent utility bills; additional checks are often carried out due to requirements set by clients. Where there is an additional layer in the contractual chain (such as a limited company) documentation is checked which includes their incorporation, insurance, and VAT status.

## **3. SANDERSON GROUP SUBSIDIARIES**

- Amber Resourcing Limited
- F5 Consultants Limited
- Fuse Recruitment Limited
- Highams Recruitment Limited
- Intelligent Resource Limited
- Method Resourcing Solutions Limited
- Pigment Consulting Limited
- Reviva Resourcing Limited
- Sanderson Executive Limited
- Sanderson Government and Defence Limited
- Sanderson Managed Services Limited
- Sanderson Projects Limited
- Sanderson Recruitment (Ireland) Limited

- Sanderson Recruitment Plc
- Sanderson Solutions International Limited

## 4. OUR SUPPLY CHAINS

- 4.1.1. 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; all are subject to due diligence checks at the outset of engagement within the Sanderson Group.
- 4.1.2. 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.
- 4.1.3. Where the Sanderson Group engage with a limited company of which the candidate is a director or employee, 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.
- 4.1.4. Our supply chain may be subject to additional due diligence checks depending on the contractual relationship and supply chain specific requirements.
- 4.1.5. 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 the National Recruitment Federation ("NRF") in Ireland, 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, or NRF, or other leading organisations.

## 5. RELEVANT POLICIES

- 5.1.1. 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.
- 5.1.2. Other relevant policies include:
- Anti-Bribery and Corruption Policy
  - Anti-Fraud and Tax Evasion Policy
  - Anti-Money Laundering Policy
  - Complaints Policy
  - Corporate Social Responsibility
  - Dignity at Work Policy
  - Modern Slavery Act Policy
  - Whistleblowing Policy
- 5.1.3. 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.
- 5.1.4. 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.

## 6. DUE DILIGENCE PROCESSES FOR SLAVERY & HUMAN TRAFFICKING

6.1.1. 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 in-depth due diligence of any new suppliers to identify any areas of concern; to include sight of documentation regarding modern slavery. Only once due diligence is considered adequate our new suppliers are included on our preferred supplier lists.
- either carrying out ourselves or requiring our suppliers to carry out, enhanced vetting of their employees.
- restricting the right of our suppliers to sub-contract services and, where it is permitted, making such subcontracting 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.
- carrying out annual in-depth due diligence on existing suppliers in order to maintain preferred supplier lists; and
- engaging specialist personnel to further enhance compliance processes and procedures.

6.1.2. 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.

6.1.3. Staff, contractors, or other parties are strongly encouraged to report any concerns or suspicions that they might have to the Operations and Implementation Director.

6.1.4. 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.
- (if applicable) removing that organisation from our preferred supplier list and passing details to appropriate law enforcement bodies.

## 7. MONITORING & COMPLIANCE

7.1.1. We continue to implement 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:

- Ongoing 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.

7.1.2. This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes Sanderson Group's slavery and human trafficking statement for the financial year ended 30 June 2024 and applies to Sanderson Solutions Group Plc and its UK and Irish subsidiaries.

**Jon Ball CEO, Sanderson Solutions Group PLC**

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*Jon Ball*  
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## 8. VERSION & CHANGE LOG

Version No.	Change Owner	Change Date	Change Description
1.1	Karen Ainsworth-Smith, Legal Services	31/05/16	New policy
2.1	Karen Ainsworth-Smith, Legal Services	20/09/17	Policy Update
3.1	Karen Ainsworth-Smith, Legal Services	24/10/18	Policy Update
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# Modern Slavery Act Transparency Statement

<b>Document Name</b>	Modern Slavery Act Transparency Statement		
<b>Document Ref.</b>	LEG05	<b>Version No.</b>	9.1
<b>Executive Owner</b>	Chief Executive Officer ("CEO")		
<b>Policy Owner</b>	Operations and Implementation Director		
<b>Approval &amp; Sign off</b>	Senior Management Team / Head of Legal		
<b>Approval Date</b>	December 2024	<b>Next Review Date</b>	December 2025
<b>Associated Policies/Documents</b>	Anti-Bribery and Corruption Policy Anti Fraud and Tax Evasion Policy Anti-Money Laundering Policy Complaints Policy Corporate Social Responsibility Policy Dignity at Work Policy Modern Slavery Act Policy Whistleblowing Policy		
<b>Document Status</b>	Draft	<b>Approved</b>	Archived
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7.1.2. The Chief Operating Officer, supported by the Operations and Implementation Director, is ultimately responsible for compliance throughout the Sanderson Group.

7.1.3. This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes Sanderson Group's slavery and human trafficking statement for the financial year ended 30 June 2024 and applies to Sanderson Solutions Group Plc and its UK and Irish subsidiaries.

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**Jon Ball**  
**CEO**  
**Sanderson Solutions Group PLC**

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**Sanderson**

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# Modern Slavery Act Transparency Statement

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<b>Document Ref.</b>	LEG05	<b>Version No.</b>	8.2
<b>Executive Owner</b>	Chief Executive Officer (“CEO”)		
<b>Policy Owner</b>	Operations and Implementation Director		
<b>Approval &amp; Sign off</b>	Senior Management Team / Head of Legal		
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<b>Executive Owner</b>	Chief Executive Officer (“CEO”)
<b>Policy Owner</b>	Operations and Implementation Director
<b>Approval &amp; Sign off</b>	Senior Management Team / Head of Legal
<b>Version</b>	7.1
<b>Date</b>	December 2022
<b>Next Review date</b>	Q3 2023
<b>Associated Policies / Documents</b>	Anti-Bribery and Corruption Policy Anti Fraud and Tax Evasion Policy Anti-Money Laundering Policy Complaints Policy Corporate Social Responsibility Policy Dignity at Work Policy Modern Slavery Act Policy Whistleblowing Policy

## 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”, “our”, “we”) 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. This Policy covers Sanderson Group’s operations in the UK and Ireland.

Sanderson Group undertakes checks in relation to all registered candidates introduced to clients to ensure candidates’ identity is clearly established. This includes checking documentation such as their right to work documentation and recent utility bills; additional checks are often carried out due to requirements set by clients. Where there is an additional layer in the contractual chain (such as a limited company) documentation is checked which includes their incorporation, insurance and VAT status.

## **Sanderson Group Subsidiaries**

Amber Resourcing Limited  
Amber Resourcing Manchester Limited  
Fuse Recruitment Limited  
Highams Recruitment Limited  
Intelligent Resource Limited  
Made Talent Limited  
Method Resourcing Solutions Limited  
Reviva Resourcing Limited  
Sanderson Executive Limited  
Sanderson Government and Defence Limited  
Sanderson Managed Services Limited  
Sanderson Projects Limited  
Sanderson Recruitment (Ireland) Limited  
Sanderson Recruitment Plc  
Sanderson (RPO and MSP Solutions) Ireland Limited  
Sanderson Solutions International Limited  
The Recruitment Factory Limited

## **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; all 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 or employee, 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.

Our supply chain 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 the National Recruitment Federation ("NRF") in Ireland, 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, or NRF, or other leading organisations.

## **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 and Tax Evasion Policy
- Anti-Money Laundering Policy
- Complaints Policy
- Corporate Social Responsibility
- Dignity at Work Policy
- Modern Slavery Act Policy
- Whistleblowing 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 in-depth due diligence of any new suppliers to identify any areas of concern; to include sight of documentation regarding modern slavery. Only once due diligence is considered adequate our new suppliers are included on our preferred supplier lists;
- either carrying out ourselves or requiring our suppliers to carry out, enhanced vetting of their employees;
- restricting the right of our suppliers to sub-contract services and, where it is permitted, making such subcontracting 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;
- carrying out annual in-depth due diligence on existing suppliers in order to maintain preferred supplier lists;
- engaging specialist personnel to further enhance compliance processes and procedures.

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 Operations and Implementation Director.

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;
- (if applicable) removing that organisation from our preferred supplier list; and ☐ passing details to appropriate law enforcement bodies.

## Monitoring and Compliance

We continue to implement 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:

- ongoing 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 Chief Operating Officer, supported by the Operations and Implementation Director, 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 Sanderson Group's slavery and human trafficking statement for the financial year ended 30 June 2022 and applies to Sanderson Solutions Group PLC and its UK and Irish subsidiaries.

DocuSigned by:  
  
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**Jon Ball, CEO**  
**Sanderson Solutions Group PLC**

### Version & Review History:

Version	Date	Comments	Author
1.1	31/05/16	New policy	Karen Ainsworth-Smith, Legal Services
2.1	20/09/17	Policy Update	Karen Ainsworth-Smith, Legal Services
3.1	24/10/18	Policy Update	Karen Ainsworth-Smith, Legal Services
3.2	02/05/19	Inclusion of RSG subsidiaries	Karen Ainsworth-Smith, Legal Services
4.1	25/11/19	Policy Update	Karen Ainsworth-Smith, Legal Services
5.1	14/12/2020	Policy Update	Karen Ainsworth-Smith, Legal Services
6.1	17/12/2021	Policy Update	Karen Ainsworth-Smith, Legal Services Mark Herus, Supplier Manager - Procurement
7.1	15/12/2022	Policy Update	Joanne Clarke, Senior Legal Counsel Mark Herus, Supplier Manager - Procurement



# Modern Slavery Act Transparency Statement

**December 2021**



<b>Executive Owner</b>	Chief Executive Officer (“CEO”)
<b>Policy Owner</b>	Operations and Implementation Director
<b>Approval &amp; Sign off</b>	Senior Management Team / Head of Legal
<b>Version</b>	6.1
<b>Date</b>	December 2021
<b>Next Review date</b>	Q3 2022
<b>Associated Policies / Documents</b>	Anti-Bribery and Corruption Policy Anti Fraud and Tax Evasion Policy Anti-Money Laundering Policy Complaints Policy Corporate Social Responsibility Policy Dignity at Work Policy Modern Slavery Act Policy Whistleblowing Policy

## 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”, “our”, “we”) 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. This Policy covers Sanderson Group’s operations in the UK and Ireland.

Sanderson Group undertakes checks in relation to all registered candidates introduced to clients to ensure candidates’ identity is clearly established. This includes checking documentation such as their right to work documentation and recent utility bills; additional checks are often carried out due to requirements set by clients. Where there is an additional layer in the contractual chain (such as a limited company) documentation is checked which includes their incorporation, insurance and VAT status.

## Sanderson Group Subsidiaries

Amber Resourcing Limited  
 Amber Resourcing Manchester Limited  
 Fuse Recruitment Limited



Highams Recruitment Limited  
 Intelligent Resource Limited  
 MDC Global Services Limited  
 Method Cloud Limited  
 Method Resourcing Solutions Limited  
 Reviva Resourcing Limited  
 Sanderson Executive Limited  
 Sanderson Government and Defence Limited  
 Sanderson Managed Services Limited  
 Sanderson Projects Limited  
 Sanderson Recruitment (Ireland) Limited  
 Sanderson Recruitment Plc  
 Sanderson (RPO and MSP Solutions) Ireland Limited  
 Sanderson Solutions International Limited

## 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; all 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 or employee, 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.

Our supply chain 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 the National Recruitment Federation ("NRF") in Ireland, 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, or NRF, or other leading organisations.

## 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 and Tax Evasion Policy
- Anti-Money Laundering Policy
- Complaints Policy
- Corporate Social Responsibility



- Dignity at Work Policy
- Modern Slavery Act Policy
- Whistleblowing 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 in-depth due diligence of any new suppliers to identify any areas of concern; to include sight of documentation regarding modern slavery. Only once due diligence is considered adequate are new suppliers included on our preferred supplier lists;
- either carrying out ourselves or requiring our suppliers to carry out, enhanced vetting of their 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;
- carrying out annual in-depth due diligence on existing suppliers in order to maintain 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 Operations and Implementation Director.

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;
- (if applicable) removing that organisation from our preferred supplier list; and
- passing details to appropriate law enforcement bodies.

### **Monitoring and Compliance**

We continue to implement 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:

- ongoing 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 Chief Operating Officer, supported by the Operations and Implementation Director, 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 Sanderson Group's slavery and human trafficking statement for the financial year ended 30 June 2021, and applies to Sanderson Solutions Group PLC and its UK and Irish subsidiaries.

DocuSigned by:

*Jon Ball*

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**Jon Ball**

**CEO**

**Sanderson Solutions Group PLC**

#### **Version & Review History:**

<i>Version</i>	<i>Date</i>	<i>Comments</i>	<i>Author</i>
1.1	31/05/16	New policy	Karen Ainsworth-Smith, Legal Services
2.1	20/09/17	Policy Update	Karen Ainsworth-Smith, Legal Services
3.1	24/10/18	Policy Update	Karen Ainsworth-Smith, Legal Services
3.2	02/05/19	Inclusion of RSG subsidiaries	Karen Ainsworth-Smith, Legal Services
4.1	25/11/19	Policy Update	Karen Ainsworth-Smith, Legal Services
5.1	14/12/2020	Policy Update	Karen Ainsworth-Smith, Legal Services
6.1	17/12/2021	Policy Update	Karen Ainsworth-Smith, Legal Services Mark Herus, Supplier Manager - Procurement



# Modern Slavery Act Transparency Statement

**December 2020**



<b>Executive Owner</b>	Chief Executive Officer (“CEO”)
<b>Policy Owner</b>	Operations and Implementation Director
<b>Approval &amp; Sign off</b>	Senior Management Team / Head of Legal
<b>Version</b>	5.1
<b>Date</b>	December 2020
<b>Next Review date</b>	Q3 2021
<b>Associated Policies / Documents</b>	Anti-Bribery and Corruption Policy Anti Fraud and Tax Evasion Policy Anti-Money Laundering Policy Complaints Policy Corporate Social Responsibility Policy Dignity at Work Policy Modern Slavery Act Policy Whistleblowing Policy

## 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”, “our”, “we”) 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 India.

Sanderson Group undertakes checks in relation to all registered candidates introduced to clients to ensure candidates’ identity is clearly established. This includes checking documentation such as their right to work documentation and recent utility bills; additional checks are often carried out due to requirements set by clients. Where there is an additional layer in the contractual chain (such as a limited company) documentation is checked which includes their incorporation, insurance and VAT status.

## Sanderson Group Subsidiaries

Amber Resourcing Limited  
 Amber Resourcing Manchester Limited  
 Fuse Recruitment Limited



Intelligent Resource Limited  
 Intelligent Resource Services Private Limited  
 MDC Global Services Limited  
 Method Cloud Limited  
 Method Resourcing Solutions Limited  
 Reviva Resourcing Limited  
 Sanderson Executive Limited  
 Sanderson Government and Defence Limited  
 Sanderson Managed Services Limited  
 Sanderson Projects Limited  
 Sanderson Recruitment (Ireland) Limited  
 Sanderson Recruitment Plc  
 Sanderson (RPO and MSP Solutions) Ireland Limited  
 Sanderson Solutions International Limited

### **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; all 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.

Our supply chain 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, or other leading organisations.

### **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 and Tax Evasion Policy
- Anti-Money Laundering Policy
- Complaints Policy
- Corporate Social Responsibility
- Dignity at Work Policy
- Whistleblowing 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 their 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;
- maintaining 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 Operations and Implementation Director.

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;
- (if applicable) removing that organisation from our preferred supplier list; and
- passing details to appropriate law enforcement bodies.

### **Monitoring and Compliance**


We continue to implement 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:

- ongoing 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 Chief Operating Officer, supported by the Operations and Implementation Director, 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 2020, and applies to Sanderson Solutions Group PLC and all its subsidiaries.



DocuSigned by:  
  
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**Jon Ball**  
**CEO**  
**Sanderson Solutions Group PLC**

**Version & Review History:**

Version	Date	Comments	Author
1.1	31/05/16	New policy	Karen Ainsworth-Smith, Legal Services
2.1	20/09/17	Policy Update	Karen Ainsworth-Smith, Legal Services
3.1	24/10/18	Policy Update	Karen Ainsworth-Smith, Legal Services
3.2	02/05/19	Inclusion of RSG subsidiaries	Karen Ainsworth-Smith, Legal Services
4.1	25/11/19	Policy Update	Karen Ainsworth-Smith, Legal Services
5.1	14/12/2020	Policy Update	Karen Ainsworth-Smith, Legal Services

# Modern Slavery Act Transparency Statement

November 2019

<b>Executive Owner</b>	Chief Executive Officer
<b>Policy Owner</b>	Group Operations Manager
<b>Approval &amp; Sign off</b>	Senior Management Team / Head of Legal
<b>Version</b>	4.1
<b>Date</b>	November 2019
<b>Next Review date</b>	Q3 2020
<b>Associated Policies / Documents</b>	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

MDC Global Services Limited  
Method Resourcing Solutions Limited  
RSG Management Limited  
Sanderson Contract Management Limited  
Sanderson Executive Limited  
Sanderson Government and Defence Limited  
Sanderson Intelligent Consulting Limited  
Sanderson IT Services Limited  
Sanderson IR Limited  
Sanderson Managed Services Limited  
Sanderson Recruitment BV  
Sanderson Recruitment GmbH  
Sanderson Recruitment (Ireland) Limited  
Sanderson Recruitment Plc  
Sanderson (RPO and MSP Solutions) Ireland Limited  
Sanderson Solutions International Limited  
VFM Resource Limited

## 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

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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.

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- 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**

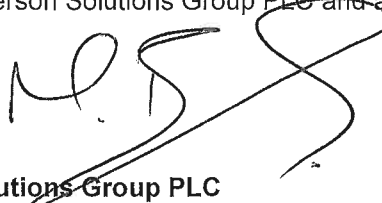
We are implementing steps to measure how effective we have been and are becoming, to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. In particular:

- 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:

Version	Date	Comments	Author
1.1	31/05/16	New policy	Karen Ainsworth-Smith, Legal Services
2.1	20/09/17	Policy Update	Karen Ainsworth-Smith, Legal Services
3.1	24/10/18	Policy Update	Karen Ainsworth-Smith, Legal Services
3.2	02/05/19	Inclusion of RSG subsidiaries	Karen Ainsworth-Smith, Legal Services
4.1	25/11/19	Policy Update	Karen Ainsworth-Smith, Legal Services



# Modern Slavery Act – Transparency Statement

October 2018

<b>Executive Owner</b>	Chief Executive Officer
<b>Policy Owner</b>	Group Operations Manager
<b>Approval &amp; Sign off</b>	Senior Management Team Head of Legal
<b>Version</b>	3.1
<b>Date</b>	October 2018
<b>Next Review date</b>	Q3 2019
<b>Associated Policies / Documents</b>	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:**

<i>Version</i>	<i>Date</i>	<i>Comments</i>	<i>Author</i>
1.1	31/05/16	New policy	Karen Ainsworth-Smith, Legal Services
2.1	20/09/17	Policy Update	Karen Ainsworth-Smith, Legal Services
3.1	24/10/18	Policy Update	Karen Ainsworth-Smith, Legal Services



# Modern Slavery Act – Transparency Statement

September 2017

<b>Executive Owner</b>	Chief Executive Officer
<b>Policy Owner</b>	Head of Compliance
<b>Approval &amp; Sign off</b>	Senior Management Team Head of Legal
<b>Version</b>	2.1
<b>Date</b>	September 2017
<b>Next Review date</b>	Q2 2018
<b>Associated Policies / Documents</b>	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.

#### **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



**Version & Review History:**

Version	Date	Comments	Author
1.1	31/05/16	New policy	Karen Ainsworth-Smith, Legal Services
2.1	20/09/17	Policy Update	Karen Ainsworth-Smith, Legal Services

# Modern Slavery Act – Transparency Statement

May 2016

<b>Executive Owner</b>	Chief Executive Officer
<b>Policy Owner</b>	Head of Compliance
<b>Approval &amp; Sign off</b>	Senior Management Team Head of Legal
<b>Version</b>	1.1
<b>Date</b>	May 2016
<b>Next Review date</b>	Q2 2017
<b>Associated Policies / Documents</b>	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

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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.

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Our relevant policies include:-

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- Anti Fraud Policy
- Anti-Money Laundering Policy
- RSG Complaints Handling Policy
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- Dignity at Work Policy
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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

### Version & Review History:

Version	Date	Comments	Author
1.1	31/05/16	New policy	Karen Ainsworth-Smith, Legal Services