

MICHAEL PAGE INTERNATIONAL RECRUITMENT LIMITED

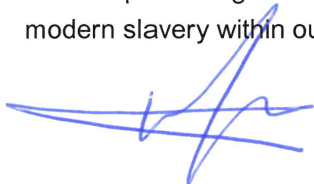
MODERN SLAVERY STATEMENT

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

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

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

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



Kelvin Stagg
Director

16 August 2019

Background

Modern slavery is a global issue which can affect any business in any sector and which is often very difficult to detect. Michael Page International Recruitment Limited recognises and takes very seriously the risk of modern slavery to our business and our people and we are committed to taking steps to reduce the risk of this abhorrent crime occurring within our business and supply chain.

Michael Page International Recruitment Limited

Michael Page International Recruitment Limited (“the Company”) is a specialist recruitment consultancy and the main UK trading company of the PageGroup plc group of companies who trade under the core brands of PAGEGROUP, PAGE EXECUTIVE, MICHAEL PAGE, PAGE PERSONNEL and PAGE OUTSOURCING. The company has c. 1,500 employees operating in the UK, with annual revenue of c. £313m.

Our Supply Chain

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

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

On an on-going basis we risk assess our supply chain and at this time we consider that there is a relatively low risk of labour exploitation or other forms of slavery and human trafficking occurring within it. Nevertheless, we are committed to preventing these practices from occurring within both our business and our supply chain, which is demonstrated by our policies and due diligence procedures as outlined below.

Our Policy on Modern Slavery and Human Trafficking

Our employees are required to comply with our Employee Code of Conduct and our suppliers with our Supplier Code of Conduct.

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

Due Diligence Processes for Slavery and Human Trafficking

Our Own Business

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

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

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

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

Our Supply Chain

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

- (a) we have mapped our tier 1 suppliers who provide goods and services direct to our business;
- (b) we have assessed each of those suppliers in the UK supply chain and ranked each as either a high, medium or low risk (relative to what we perceive to be the risk generally to our supply chain);
- (c) we have ensured that all RFP processes include a series of due diligence queries designed to identify potential suppliers' approach to modern slavery and enable determination of whether they should be considered high risk;
- (d) in addition, each supplier that we rank as a high risk has either been sent a questionnaire so we can further assess their approach to the issue of modern slavery or their approach to modern slavery has been assessed;
- (e) our terms and conditions with our key suppliers include anti-modern slavery clauses which place an obligation on suppliers to comply with the Modern Slavery Act 2015 and contain rights of audit to help us identify unethical practices; and
- (f) we have provided guidance and support to our procurement teams on modern slavery matters.

If we were to find evidence that one of our suppliers has failed to comply with the Modern Slavery Act 2015 then we would require the relevant supplier to remedy such non-compliance and we would consider terminating our relationship should we see no improvement in the way their business is conducted.

This approach is designed to:

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

Risk and Compliance

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

Key Performance Indicators

Given our view that the Company's exposure to modern slavery risk is limited, and the existing due diligence processes we already have in place as an organisation, we have not implemented key performance indicators in relation to modern slavery and human trafficking during the previous financial year.

Further Steps

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

- continue to monitor the risk to our supply chain on an ongoing basis;
- provide deep-dive, refresher training for our global procurement team; and
- establish a modern slavery working group to consider actions that can be taken to minimise the risk of modern slavery across the supply chain and/or whether any key performance indicators could be introduced.

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

Kelvin Stagg, Director

Michael Page International Recruitment Limited

Date: 16 August 2019