

Modern Slavery Statement

Compliance with the Modern Slavery Act UK 2015

This Statement focuses on Alexander Mann Solutions' (AMS) compliance with the Modern Slavery Act UK 2015 and highlights the steps it takes to:

1. Ensure there is no Modern Slavery occurring within our own business
2. Provide assurance that AMS takes reasonable measures to mitigate the risk of Modern Slavery occurring within its supply chains

This Statement is reviewed and signed-off annually by our CEO and CFO, within 6 months of AMS' December financial year-end; in line with the legislative requirements set out in the Modern Slavery Act UK 2015.

Organisation Structure and Supply Chains

This Statement covers the AMS Group of Companies, including, Alexander Mann Group Limited, AMS Midco Ltd, Alexander Mann Solutions Limited, Auxey HoldCo Limited – collectively referred to as Alexander Mann Solutions.

Alexander Mann Solutions is an international talent acquisition and management company headquartered in the UK and operating globally in over 80 countries. With over 4000 employees around the world, AMS is passionate about delivering adaptable, world class, talent solutions in partnership with our clients; based on the fundamental belief that people are the foundation of our success. Alexander Mann Solutions is committed to a zero-tolerance approach to Modern Slavery within our business and from within our supply chains.

As a world leader in recruitment process outsourcing operating predominantly in the labour supply sector, AMS manages its business carefully and responsibly.

Policies in Relation to Slavery and Human Trafficking

AMS meets its responsibilities through operating in a transparent environment. It is committed to acting with integrity and treating all individuals with fairness and respect; this is demonstrated through the way it conducts its operations in accordance with set principles, procedures, and policies as well as having appropriate governance and controls in place.

Alexander Mann Solutions was shaped and built on the values of being authentic, distinctive, passionate and brave. These values have guided the way AMS does business, by defining how personnel are expected to treat clients, candidates, partners, communities, and each other.

AMS' Global Code of Conduct outlines these Corporate Values as well as the behaviours and actions that all personnel are expected to undertake and exemplify. The code is designed to provide a reference of standards in delivering services whilst ensuring compliance with applicable legislative and regulatory requirements. Furthermore, the Code of Conduct is the foundation upon which many of the Compliance policies and procedures are established.

It is expected that all personnel are fully compliant with the Global Code of Conduct and Group policies and they are required to complete annual training to refresh awareness. Policies are maintained on the Group intranet and are accessible by all staff. The policies are reviewed on at least an annual basis, or upon a change in legislation.

In keeping with its commitment to ensure that personnel work with the highest standards of integrity and act authentically, several of AMS's existing policies include commitments relating to the prevention of slavery or human trafficking in any part of the business or its supply chain. These include but are not limited to:

- Anti-Slavery and Human Trafficking Policy
- Procurement & Supply Management Policy
- Global Code of Conduct & Raising Concerns Procedure
- Global Supplier Code of Conduct
- Anti-Bribery and Corruption Policy
- Training and Study Policy
- Environmental Statement and Policy

Channels are available for personnel or suppliers to confidentially raise any concerns regarding actual or suspected breaches to policy or behaviour that contravenes our Code of Conduct. AMS promotes the concept that compliance is everyone's responsibility and take a zero-tolerance approach to any form of retaliation to individuals who raise concerns in good faith.

The Alexander Mann Group's Anti-Slavery & Human Trafficking Policy is owned by the Chief Executive Officer, with oversight delegated to the Global Head of Compliance. In line with legal requirements, the Alexander Mann Solutions Group Chief Financial Officer is responsible for presenting the annual Modern Slavery Statement for CEO approval.

Supply Chain Due Diligence Processes

The Procurement and Supply Management Policy is owned by the Chief Financial Officer; with oversight delegated to the Global Head of Procurement.

Alexander Mann Solutions' Procurement & Supplier Management Team use a risk-based approach to monitor implementation of and adherence to the Procurement and Supply Management Policy and its application in the supply chain. Third Party risk and the associated mitigation plans is, as described above, monitored by the Risk and Compliance Committee on a quarterly basis.

All prospective suppliers of AMS are required to pass due diligence tests before being accepted, with these activities being supported by an online 3rd Party Assurance registration tool. The tool enables AMS to apply a comprehensive due diligence program and drive the best standards of compliance - Suppliers are only engaged where they have met the minimum prevailing standards, including appropriate safeguarding policies around Modern Slavery.

Suppliers are engaged on terms and conditions which are inclusive of requirements to comply with legislation such as the UK Modern Slavery Act 2015. AMS has the right to terminate any contract where there has been a breach of those terms or any other non-compliance with AMS policy.

Risk Assessment, Prevention & Mitigation

Alexander Mann Solutions has deployed a comprehensive Risk Program with risk registers maintained across all areas of the business which are reviewed and updated monthly. A Risk and Compliance Committee, with members including the CEO, CFO and an Independent Director, sits quarterly and assesses the appropriateness of risk treatment plans accordingly.

Any concerns raised via our confidential Raising Concerns channels are reviewed and investigated by an appropriate subject matter expert and concerns raised are reported to the AMS Risk and Compliance Committee. Disciplinary and termination procedures are managed by HR to act should an individual or group of individuals breach any of our policies.

Training on Preventing Modern Slavery & Trafficking

Corresponding E- learning training and awareness activities are in place to ensure personnel understand how to comply with policy requirements. AMS' Anti-Slavery Policy and Preventing Modern Slavery online training module include the common warning signs that an individual subjected to Modern Slavery may display; and what an employee should do if they observe any of these. The policy and training are reviewed annually by AMS' Global Compliance and Training & Development functions, along with this Modern Slavery statement.

All new hires are required to read the Anti-Slavery Policy and undergo the Preventing Modern Slavery online training within the first three months of joining AMS, and all staff are required to refresh their awareness each year. Completion of these tasks are assigned, reminded, and tracked on AMS' Learning Management system; and compliance is ensured by People Managers.

Key Performance Indicators to Measure Effectiveness of Steps Being Taken

Effectiveness in ensuring that slavery and human trafficking is not taking place within the Alexander Mann Solutions business or supply chains, is measured against appropriate KPIs:

New Staff Awareness

Minimum 90% of all new AMS staff to attest to having read and agree to abide by AMS' Code of Conduct within 1 week of start, as well as completing the Preventing Modern Slavery Training (including reading AMS' Anti-Slavery Policy) within 3 months of start.

Existing Staff Awareness

Minimum 90% of existing AMS staff to have refreshed awareness by attesting to have re-read and agree to abide by AMS' Code of Conduct on annual basis, as well as re-completing the Preventing Modern Slavery Training (including reading AMS' Modern Slavery Policy) on annual basis.

Progress Financial Year 2019-20

Each year AMS continues to mature its compliance activities across the organisation; This includes activities to prevent Modern Slavery in the business and its supply chain. Below details the progress made in the Financial Year 2019 -2020:

- New Mandatory awareness KPIs and process introduced
- AMS Global Code of Conduct issued annually to all staff requiring attestation to demonstrate understanding and compliance to the content
- Continued promotion of the global Whistleblowing channels to enable raising of concerns regarding the failure to adhere to the requirements

Summary


Alexander Mann Solutions is fully supportive of the Modern Slavery Act and its aims and will not knowingly support or deal with any business involved in slavery or human trafficking. It will continue to invest in compliance with legal obligations.

Approved by the AMS Board of Directors

Signed..........

Jo Roberts – Chief Financial Officer

Date..... 1 June 2020.....


Signed.....

David Leigh - Chief Executive Officer

Date..... 1 June 2020.....