

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015  
and constitutes the Group's slavery and human trafficking statement for the  
financial year ending December 2021 and has been approved by the Board of  
Impellam Group plc ("Impellam")**

Impellam Group plc is an international people business. We focus on harnessing the extraordinary qualities of people who make a valuable difference to communities, businesses and economies. All Impellam brands share a culture of making and keeping promises – to our clients, our candidates and each other – engendering trust and lasting relationships.

*Our mission is to provide fulfilment and a sense of purpose for our people and help  
our customers build better businesses in a changing world*

This mission, together with our shared signature practices, gives clear guidance on the behaviours and actions we expect from all the people and organisations that work with Impellam. We choose to engage and partner with like-minded organisations because they recognise people should be treated with dignity and respect.

Impellam do not believe there is any place in today's world for slavery or human trafficking. We are committed to continually improving our practices to combat slavery and human trafficking and to encourage the same high standards from our supply chain and other business partners.

Impellam is a global provider of staffing and recruitment services to a wide range of clients covering a broad range of industry sectors. We have over 2,900 employees globally across more than 70 locations across the UK, North America, Australasia and Europe. The Group had a global annual turnover in 2021 of £2.2bn and has its registered office in Luton, Bedfordshire.

Impellam purchases a wide range of products and services from its supply chain, including IT hardware, software and telecommunications; vehicles; office furniture, equipment and supplies; utilities; travel services; and training services.

Impellam's Supplier Code of Conduct reflects our responsibility to act ethically and with integrity in all our business relationships, including our commitment to combating human trafficking and slavery. We believe our highest areas of potential risk are within our supply chain, and in the provision of agency labour.

In order to mitigate and manage our risk the following activities have been undertaken in 2021:

- Our Modern Slavery policy has been reviewed to ensure it is still fit for purpose.
- Our Modern Slavery policy has been issued to all new employees, who have acknowledged and confirmed they have read and understood the same.
- All new employees are required to complete Modern Slavery training within one month of joining the Company and existing employees should complete refresher Modern Slavery training annually, part

of which includes the Modern Slavery policy.

- We conducted a global survey of our staff with respect to the training at the end of January 2022:
  - 96% of respondents completed the training on time;
  - 92% of respondents thought the training improved their ability to identify modern slavery or human trafficking;
  - 96% of respondents confirmed they knew what to do if they identified or suspected human trafficking or modern slavery;
  - 23% of respondents would like more support on how to identify and handle modern slavery or human trafficking
- As a result of the survey we shall investigate what further resources are available for those who would like further support. In addition further communications will be sent to managers to advise them of staff who have not yet completed the training.
- All employees have been advised on how they can report any concerns they may have associated with Modern Slavery.
- All employees have been reminded of our confidential whistleblowing helpline if they wish to make an anonymous report and posters are displayed in our offices.
- All suppliers agree to comply with our Supplier Code of Conduct as part of their contractual relationship with Impellam and its businesses.
- When tendering suppliers are required to provide information on how they comply with the regulatory responsibilities including the Modern Slavery Act.
- Our significant suppliers are required to complete an ethical questionnaire. We take a risk-based approach towards our suppliers due to the number we engage and undertake audits on those suppliers where we consider the exposure to be greatest. No significant problems have been indicated within our supply chain.
- All our branches received at least one compliance audit during which pre-employment checks, including eligibility to work, references, qualifications and proof of national insurance numbers, were reviewed.
- We have performed random checks within our UK businesses to identify where agency workers may be sharing bank accounts, addresses or telephone numbers as this can be an indication of illegal or unethical behaviour. Where these are shared, we approach the individuals involved to ensure this is voluntary, for example where couples share a bank account.
- We have not used or accepted forced, bonded or involuntary prison labour or child labour; nor will we hold onto our workers' identity papers or knowingly work with businesses that do.
- No breaches of the Modern Slavery Act were reported during 2021.

We review our policies and procedures regularly, not only to ensure they remain relevant, but also to assess our progress.

This statement applies to Impellam Group plc and all its subsidiaries.



Julia Robertson Group  
CEO Impellam Group plc  
Date: 1 April 2022