

Modern Slavery Transparency Act

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Policy Owner	Operations and Implementation Director		
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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 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.

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
- Amber Resourcing Manchester Limited
- F5 Consultants Limited
- Founders Seed Limited
- Fuse Recruitment Limited
- Highams Recruitment Limited
- Intelligent Resource Limited
- Made Talent (Bristol) 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 (RPO and MSP Solutions) Ireland Limited
- 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. 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 2023 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

8. VERSION & REVIEW HISTORY

Version	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
3.2	Karen Ainsworth-Smith, Legal Services	02/05/19	Inclusion of RSG subsidiaries
4.1	Karen Ainsworth-Smith, Legal Services	25/11/19	Policy Update
5.1	Karen Ainsworth-Smith, Legal Services	14/12/2020	Policy Update
6.1	Karen Ainsworth-Smith, Legal Services Mark Herus, Supplier Manager - Procurement	17/12/2021	Policy Update
7.1	Joanne Clarke, Senior Legal Counsel Mark Herus, Supplier Manager - Procurement	15/12/2022	Policy Update
8.1	Nicola Price	13/12/2023	Change to format and document reference number
8.2	Joanne Clarke, Senior Legal Counsel Mark Herus, Head of Supplier Management.	14/12/2023	Policy Update