

*This statement was made on or about 1 April 2024 pursuant to section 54(1) of the Modern Slavery Act 2015 (UK), the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW) and constitutes the Group's slavery and human trafficking statement for the financial year ending December 2023, and as approved by the Board of Impellam Group plc ("Impellam").*

## **OUR MISSION IS TO BE THE WORLD'S MOST TRUSTED WORKFORCE AND STEM TALENT SOLUTIONS GROUP.**

***We believe in the power of work.***

***Through the power of work, we build better businesses and help people lead more fulfilling lives.***

Our award winning Global Managed Services provide a diverse range of digitally enabled, multidisciplinary workforce solutions to organisations around the world. We are upper quadrant industry leaders in Managed Service Provision and Services Procurement, and the seventh largest Managed Service Provider in the world with over £4bn SUM (Spend under Management).

Our STEM businesses are specialists in recruiting and engaging talent in the key growth markets of technology, digital, data, science, clinical and engineering. We work with clients across all sectors and sizes delivering services that span Managed Services (MSP), Recruitment Process Outsourcing (RPO), Statement of Work (SOW) and specialist recruitment.

At Impellam we are united by one purpose, one culture, one driving force. We call it Virtuosity. It's how we do what we do. It's why we're different. It's our determination to do even more and to always be ambitious and brave for all our stakeholders.

Led by our Virtuosos, our capabilities are underpinned by proprietary digital technology and unique partnerships with market-leading software providers, enabling us to transform and future-proof our services.

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.

**Policy and Training**

Impellam's policies are established by our Legal and People Support teams and take into account advice from industry professionals and industry best practices. We have a suite of policies including a Code of Conduct for dealing with our Competitors and a Code of Business Conduct which summarises how we operate as a business and incorporates our main policies such as Bribery and Corruption, Modern Slavery and Whistleblowing.

All Impellam employees have access to our policy suite from day one of their employment. Employees undertake initial on-boarding training and annual refresher training on our bespoke learning and development platform KnowHow. This training includes modules on Modern Slavery, Whistleblowing, Bribery and Corruption, Sustainability and incorporates a review of the associated policies.

Adherence to Impellam policies is expected of all our employees and any breaches will be taken seriously and employees are asked to acknowledge and confirm that they have read and understood these policies and procedures.

Details on how employees can report any concerns is covered in these policies and employees are regularly reminded of our confidential whistleblowing helpline if they wish to make an anonymous report.

Our policies are reviewed annually to ensure they are still fit for purpose.

**Supply Chain**

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

Impellam also engage with a large number of likeminded workforce solutions suppliers such as recruitment agencies, recruitment businesses, umbrella organisations, consultancies, SOW providers and personal services companies.

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. All our suppliers are asked to agree to comply with our Supplier Code of Conduct as part of their contractual relationship with Impellam and its businesses.

In 2023 we updated our supply chain modern slavery procedure for our current recruitment supply chain. Our Modern Slavery Ethical Trade and Human Rights Questionnaire will now be issued to a selection of active suppliers. Responses will be reviewed by our Customer Experience team and the relevant Impellam business to identify and concerns or improvements required for our supply chain in order to ensure they meet and adhere to our standards.

By 2025 we plan to extend the issuing of this questionnaire to all active suppliers.

When tendering for our business suppliers are required to provide information on how they comply with the regulatory responsibilities including the Modern Slavery Act. However, in 2024 we will look to expand our supply chain modern slavery procedure to our procurement suppliers.

All our managed service accounts received at least one compliance audit during which pre-employment checks, including eligibility to work, references, qualifications, were reviewed.

### **Workers**

Our Payroll team also continue to undertake a weekly electronic report to check payroll details for all our agency workers to identify address and bank detail similarities and these are investigated and escalated to our Quality and Risk Assurance Manager where appropriate.

Payslip audits are also undertaken on our umbrella providers and in 2024 we will look at ways of ensuring they are undertaking similar robust and appropriate checks to their workers.

### **Impact Report**

Increasingly people are looking to businesses to lead the way on regulatory, economic, environmental and social sustainability. As a purpose-led, connected business we're uniquely placed to help build better businesses and help people lead more fulfilling lives through the power of work.

We have created our Impact Report to highlight our social impact, and our CSR and sustainability strategies. The report showcases how we're helping to create inclusive and welcoming workplaces by removing barriers to employment, and how we are providing life-changing opportunities for our candidates.

We share our wellbeing, social purpose and ED&I initiatives and are transparent about our journey to Net Zero. The report shares strategy and inspiration for how, together, we can change businesses, change lives and change futures.

**Our Impact Report can be downloaded and read at:**

<https://www.impellam.com/insights/impellam-launches-impact-report>

**Summary**

This statement applies to Impellam and all its subsidiaries globally, including the following subsidiaries incorporated in Australia:

- Comensura Pty Limited; and
- Flexy Services Pty Limited.

Impellam is an international connected group providing global workforce, specialist recruitment, labour-hire and associated solutions. Our 2,000 people and market leading brands work across a broad spectrum of industries and job categories throughout North America, the UK and Europe and APAC. The Group had a global annual turnover in 2023 of £2.0bn and has its registered office in Luton, Bedfordshire.

No breaches of the Modern Slavery Act were reported during 2023.

Signed for an on behalf of Impellam Group plc and all its subsidiaries globally.



Julia Robertson Group  
CEO Impellam Group plc

Date 28 March 2024