



MODERN SLAVERY STATEMENT

NES Fircroft Limited is a global workforce solutions specialist operating across 45+ locations worldwide, delivering optimum solutions to customers in a variety of sectors.

We offer a full range of staffing solutions: Contract, Permanent (Direct) Hire, Managed Solutions, and full outsourced services, complemented by an industry leading support services and global mobility package to ensure our clients keep hold of the top talent in a compliant manner for as long as they need it.

REPORTING REQUIREMENTS//

Pursuant to Section 54(1) of the UK's Modern Slavery Act 2015 and Section 16 of the Australian Modern Slavery Act 2018 (collectively "the Legislation"), this statement constitutes NES Fircroft's modern slavery and human trafficking statement and outlines NES Fircroft's approach to tackling modern slavery.

This statement is made by NES Fircroft Limited and covers the businesses global operations. Specifically, this statement reflects each of its business entities set out in Appendix 1 who have reporting responsibilities under the Legislation.

OUR APPROACH & COMMITMENT//

Personal integrity and responsibility are the foundation of our business; we differentiate our solutions on the basis of compliance, integrity, and responsibility, and in accordance with local and international laws.

Within this context, NES Fircroft will not accept any practices involving slavery, servitude, forced or compulsory labour, or human trafficking. We are committed to these principles and to taking all reasonable steps to ensure slavery and human trafficking are not taking place within our business, that of our partners or the ensuing supply chain.

OUR POLICY//

NES Fircroft's business conduct is defined by our [core business values](#) and a series of corporate policies which collectively outline NES Fircroft's 'Expected Business Conduct'; a framework of legal, ethical and industry standards targeted at NES Fircroft stakeholders at all levels.

Our [Business Ethics policy](#) sets out the high ethical standards expected across our global operations and works to ensure that these standards are communicated and understood by NES Fircroft employees and companies with which NES Fircroft do business with. Our policies support NES Fircroft's commitment to ensure basic human rights principles are afforded to individuals and outlines the principles that guide our business practices.

All NES Fircroft employees are required to comply with business policy.

Expected Business Conduct clearly states that NES Fircroft will not tolerate practices that do not meet our ethical standards.

OUR SUPPLIERS//

In the UK, Australia and the rest of the world, the majority of our supply chain incorporates business partners and professional consultancy services, namely financial or legal specialists, or organisations that partner with NES Fircroft in the mobilisation of personnel. A further proportion of our supply chain is linked to commodities, such as utilities, workplace equipment and welfare provisions. We consider the risks of forced labour and human trafficking to be relatively low in our supply chains but take proportionate steps to mitigate that risk.

Our global supplier evaluation process assesses the types of supplier we use and tailors' questionnaires according to risk tiers. The process incorporates a detailed [Code of Conduct for Business Partners & Suppliers](#) obligating external providers to declare their commitment to ethical standards, including anti-slavery and the avoidance of any human trafficking or forced labour practices within their own business and throughout their supply chain.

OUR MANAGEMENT CONTROLS//

Our recruitment processes underpin expectations from employees, suppliers and customers, and act to ensure transparency in our recruitment operations for an assurance that individuals are not being placed into any situation that may be construed as Modern Slavery.

Controls include, but are not limited to:

- Placements being subject to compliance checks deriving from legal, industry and contractual obligations;
- Recruitment protocol and expected business conduct obligations being communicated throughout global operations;
- Terms of Business with clients and Contract for Services with contractors are agreed in all instances; and
- Supplier evaluation procedures incorporate specific declarations of compliance to NES Fircroft's 'Code of Conduct'.

Continual Improvement is important for NES Fircroft. We continue to assess risks associated with modern slavery across the business and within our supply chain, whether such risks are directly or indirectly linked to our business activity or relating to the geographical areas in which we operate. We have strengthened our Business Ethics training and launched refreshers through a dedicated Learning Management System ensuring all NES Fircroft employees have non-stop access, including any new members joining the NES Fircroft business.

Our supplier evaluation process is embedded across our global operations, ensuring all new suppliers declare commitment and compliance to NES Fircroft's expected business conduct standards. NES Fircroft also consults with the relevant operating companies on an ongoing basis to assess any specific risks presented and ensure they all understand and follow the procedures and controls in place.

Monitoring is undertaken in line with the control measures identified as key areas to mitigate perceived risks or indicators of modern slavery practices and groups. Policy and associated documents are subject to regular audit and review.

Training & Awareness for employees is delivered through NES Fircroft's Expected Business Conduct framework. Training is mandatory for all employees globally; business ethics being a key module for review, acknowledgement, and acceptance.

Combined with NES Fircroft's central incident reporting area, global employees are provided with awareness on indicators, prevention, and reporting lines associated with our Expected Business Conduct framework.

This Statement is prepared following consultation with the corporate functions across our global business encompassing Commercial & Legal, Compliance, Risk and Quality Management and is made in accordance with the Legislation, constituting the Company's slavery and human trafficking statement for the financial year ending 31st October 2020.

Content has been approved on behalf of the NES Fircroft Board of Directors



Ian Campbell
Director of Risk
April 2021

APPENDIX 01

Business entities covered by this statement.

Business Entity	Registration No.	Country of Registration
Fircroft Australia PTY Ltd	CAN 100 091 245	Australia
Fircroft Engineering Services Limited	01405855	England and Wales
NES Advantage Solutions Limited	5309561	England and Wales
NES Global Limited	2690805	England and Wales
NES Global Pty Limited	14 130 240 452	Australia
NES Global Talent Services Pty Ltd	ABN 94 627 597 184	Australia
NES UK Limited	01443574	England and Wales