

Modern Slavery Act Compliance Statement for Manpower UK Limited for 2018

GLOBAL STATUS

Manpower UK Limited is a subsidiary of ManpowerGroup Global, Inc. which is the World's workforce expert.

In January 2006, Manpower was the first global corporation to sign up to the Athens Ethical Principles. The Principles declare a "zero tolerance" policy for working with any entity benefiting in any way from human trafficking, including clients, suppliers and business partners. The Athens Ethical Principles are an initiative of the "End Human Trafficking Now!" (EHTN!) campaign, built on a partnership of corporations, organizations and committed individuals. The campaign is endorsed by a host of global organizations including the United Nations High Commissioner for Refugees and the International Labor Organization.

WORLD'S MOST ETHICAL COMPANIES

In 2015, ManpowerGroup was named to the Ethisphere Institute's World's Most Ethical Companies list for its proven commitment to ethical leadership, compliance, corporate social responsibility and business practises at large. ManpowerGroup has been recognised for five consecutive years. For more than 65 years Manpower has built a corporate culture of trust, integrity and accountability. Conducting business in an ethical and responsible manner is part of our company's DNA. A commitment to human rights, fair labour practises and ethical business dealings is essential to our principles-based culture and is recognised both inside and outside our company. Every year, as part of our ManpowerGroup Annual People Survey, we ask our colleagues for feedback on our ethical standards. The response has been consistently positive.

CODE OF BUSINESS CONDUCT AND ETHICS TRAINING

Our Code of Business Conduct and Ethics provides guidance to all of our colleagues and partners on the conduct of our business according to the highest ethical standards. We have grown and prospered with a culture of honesty, integrity and accountability. The Code contributes to our future success by helping to maintain this culture. The Code and our other ethics policies help to focus everyone on areas of ethical risk, offer guidance in recognising and dealing with ethical issues and provide mechanisms to report unethical conduct without fear of retaliation. All colleagues are required to complete training and certification annually to build their training and knowledge. Our code provides a compliance hotline for employees to inform (on an anonymous basis) any concerns with activities of the Company or the supply chain.



HUMAN RIGHTS

As workforce solutions experts, we are committed to respecting internationally proclaimed human rights and fair labour practices and to embedding these practices into our operations. We understand the importance of protecting and promoting fundamental principles and rights at work. Our standard practices are designed to protect these rights throughout the recruitment, selection and employment of our employees and the individuals that we place on assignment with our clients. We also participate in a number of local, national and international activities that work to eradicate human trafficking and child labour and promote diversity in the workforce.

OUR PROCESSES

Within the United Kingdom, Manpower UK Limited:

- has held a corporate Gangmasters licence since the inception of the Gangmasters Licensing Authority (GLA) which was formed as an independent body arising out of the Gangmasters (Licensing) Act 2004. Its Mission Statement is to Work in partnership to protect vulnerable and exploited workers
- is a member of REC (the Recruitment and Employment Confederation) and Apsco (the Association of Professional Staffing companies) which are the relevant forums within the UK for the recruitment industry
- is a founding member of SAFERjobs (Safe Advice for Employment and Recruitment). This is a Recruitment Industry Counter-Fraud Forum, which is a non-profit making organisation created to raise awareness and combat criminal activities that may be attempted on those within the industry or through the services provided by the industry. SAFERjobs works with the Metropolitan Police, Department for Business, Innovation and Skills (BIS), Department for Work and Pensions (DWP), Trading Standards, City of London Police, recruitment industry trade associations and private sector recruitment businesses.

We have rigorous policies and processes in place to ensure compliance with all relevant legislation to the Services that we provide. These include:

- Our onboarding process is designed to ensure that all checks are made on candidates prior to commencement of services
- Our compliance team undertake both internal and external audits and we are also subject to client audit on a regular basis
- Our payroll team carry out regular checks on worker bank details to identify potential illegal behavior, e.g., sharing of bank accounts and addresses
- Our online system allows workers to verify their details and payments whenever they wish.

SUPPLY CHAIN

Within our UK supply chain, we seek positive assurance that suppliers agree to comply with the principles of our Corporate Social Responsibilities Policy, which forms part of the contract with supply chain, and where appropriate, we carry out due diligence on prospective suppliers, as well as auditing existing and prospective suppliers with regard to legal and contractual compliance. We take a risk-based approach to addressing concerns that may arise from our supply chain and we monitor their activities

through review and discussion. We expect all suppliers to operate in accordance with our Supply Chain Business Partner Policy. We procure that our supply chain flow these terms down to their own suppliers and subcontractors.

We review our policies and procedures on a regular basis to ensure not only ongoing compliance to our standards but that our supply chain shares the same principles and commitment to the Modern Slavery Act.

There have been no reported breaches of the Modern Slavery Act within our business in 2018.

A handwritten signature in black ink, appearing to read 'Mark Cahill', written in a cursive style.

Mark Cahill
Managing Director
01 January 2019