



A|M|S

AMS Modern Slavery Statement - 2021

Version 1.0 – June 2021

Document Classification: General

True
Workforce
Dexterity



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Section 1 Compliance with the Modern Slavery Act UK 2015

This Statement focuses on Alexander Mann Solutions' (AMS) compliance with the Modern Slavery Act UK 2015 and highlights the steps it takes to:

1. Ensure there is no Modern Slavery occurring within our own business
2. Provide assurance that AMS takes reasonable measures to mitigate the risk of Modern Slavery occurring within its supply chains

This Statement is reviewed and signed-off annually by our Chief Executive Officer and Managing Director Legal, Risk & Compliance, within six months of AMS' December financial year-end; in line with the legislative requirements set out in the Modern Slavery Act UK 2015.

Section 2 Organisation Structure and Supply Chains

This Statement covers the AMS Group of Companies, including, Auxey HoldCo Limited, Auxey Finco Limited, Auxey Midco Ltd, Auxey Bidco Limited, Alexander Mann Group Limited, and Alexander Mann Solutions Limited, – collectively referred to as AMS.

AMS is a leading global total workforce solutions firm founded in 1996. We enable organisations to thrive in an age of constant change by building, reshaping and optimising workforces. Operating predominantly in the labour supply sector, AMS manages its business carefully and responsibly.

We do this through talent acquisition and contingent workforce management, internal mobility and skills development, and talent and technology advisory services. Our solutions are delivered by our 4500+ experts who live our passionate, bold and authentic values. The ultimate aim is to help clients around the world, including 100+ blue-chip companies, create workforces that are fluid, resilient, diverse and differentiated. We call this True Workforce Dexterity. AMS is committed to a zero-tolerance approach to Modern Slavery within our business and from within our supply chains.

Section 3 Policies in Relation to Slavery and Human Trafficking

AMS meets its responsibilities through operating in a transparent environment. It is committed to acting with integrity and treating all individuals with fairness and respect; this is demonstrated through the way it conducts its operations in accordance with set principles, procedures, and policies as well as having appropriate governance and controls in place.

AMS was shaped and built on the values of being passionate, bold and authentic. These values have guided the way AMS does business, by defining how personnel are expected to treat clients, candidates, partners, communities, and each other.

AMS' Global Code of Conduct (the "Code") outlines these corporate values as well as the

behaviours and actions that all personnel are expected to undertake and exemplify. The Code is designed to provide a reference of standards in delivering services whilst ensuring compliance with applicable legislative and regulatory requirements. Furthermore, the Code is the foundation upon which many of the compliance policies and procedures are established.

It is expected that all personnel are fully compliant with the Code and AMS policies and they are required to complete annual training to refresh awareness. Policies are maintained on the AMS intranet and are accessible by all staff. The policies are reviewed on at least an annual basis, or upon a change in legislation or regulation.

In keeping with its commitment to ensure that personnel work with the highest standards of integrity and act authentically, several of AMS's existing policies include commitments relating to the prevention of slavery or human trafficking in any part of the business or its supply chain. These include but are not limited to:

- Anti-Slavery and Human Trafficking Policy
- Procurement & Supply Management Policy
- Global Code of Conduct & Raising Concerns Procedure
- Global Supplier Code of Conduct
- Anti-Bribery and Corruption Policy
- Global Fraud Prevention
- Global Sanctions Policy

Access for anyone to confidentially raise any concerns regarding actual or suspected breaches to policy or behaviour that contravenes our Code or any AMS policy is publicly available on the AMS external website. AMS promotes the concept that compliance is everyone's responsibility and takes a zero-tolerance approach to any form of retaliation to individuals who raise concerns in good faith.

AMS's Anti-Slavery & Human Trafficking Policy is owned by the Chief Executive Officer, with oversight delegated to the Global Head of Risk & Compliance. In line with legal requirements, the AMS Managing Director Legal, Risk & Compliance is responsible for presenting the annual Modern Slavery Statement for approval by the Chief Executive Officer.

Section 4 Supply Chain Due Diligence Processes

The Procurement and Supply Management Policy is owned by the Chief Financial Officer; with oversight delegated to the Global Head of Procurement.

AMS's Procurement & Supplier Management Team use a risk-based approach to monitor implementation of and adherence to the Procurement and Supply Management Policy and its application in the supply chain. Third party risk and the associated mitigation plan is monitored by the Risk and Compliance Committee on a bi-monthly basis.

All prospective suppliers of AMS are required to pass due diligence checks before being accepted, with these activities being supported by an online third party assurance registration tool. The tool enables AMS to apply a comprehensive due diligence program and drive the best standards of compliance. Suppliers are only engaged where they have met the minimum prevailing standards, including appropriate safeguarding policies around Modern Slavery.

Suppliers are engaged on terms and conditions which are inclusive of requirements to comply with legislation such as the UK Modern Slavery Act 2015. AMS has the right to terminate any contract where there has been a breach of those terms or any other non-compliance with AMS policy.

Section 5 Risk Assessment, Prevention & Mitigation

AMS has deployed a comprehensive risk program with risk registers maintained across all areas of the business which are reviewed and updated regularly. The Risk and Compliance Committee, with members including the Chief Executive Officer, Chief Financial Officer, Managing Director Legal, Risk & Compliance and an independent director, sits bi-monthly and assesses the appropriateness of risk treatment plans accordingly.

Any concerns raised via our confidential 'Raising Concerns' channels are reviewed and investigated by an appropriate subject matter expert and concerns raised are reported to the AMS Risk and Compliance Committee. Disciplinary and termination procedures are managed by Human Resources should an individual or group of individuals breach any of our policies.

Section 6 Training on Detecting and Preventing Modern Slavery & Trafficking

Corresponding e-learning training and awareness activities are in place to ensure personnel understand how to comply with policy requirements. AMS's Anti-Slavery Policy and Preventing Modern Slavery online training module, include the common warning signs that an individual subjected to Modern Slavery may display; and what an employee should do if they observe any of these. The policy and training are reviewed annually by AMS's Global Head of Risk & Compliance along with this Modern Slavery statement.

All new hires are required to read the Anti-Slavery and Human Trafficking Policy and undergo the Preventing Modern Slavery online training within the first three months of joining AMS, and all staff are required to refresh their awareness each year. Completion of these tasks are assigned, tracked and prompted where required on AMS's Learning Management system; and compliance is assured by people managers.

Section 7 Key Performance Indicators to Measure Effectiveness

Effectiveness in ensuring that slavery and human trafficking is not taking place within the AMS business or supply chains, is measured against appropriate key performance indicators, including:

- **New Staff Awareness**
All new AMS staff to attest to having read and agreed to abide by AMS's Code of Conduct within one week of start, as well as completing the Preventing Modern Slavery Training (including reading AMS's Anti-Slavery Policy) within 3 three months of start.

- **Existing Staff Awareness**
Existing AMS staff to have refreshed awareness by attesting to have re-read and agreed to abide by AMS's Code of Conduct on annual basis, as well as re-completing the Preventing Modern Slavery Training (including reading AMS's Modern Slavery Policy) on an annual basis.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including anti-slavery clauses in our supply contracts.
- Identify and assess potential risk areas in our supply chains, via due diligence questionnaires and audits where appropriate.
- Engaging only with suppliers who meet our minimum standards and expectations with regards to the detection and prevention of Modern Slavery.
- Protection of whistleblowers.

Section 8 Progress Financial Year 2020-21

Each year AMS continues to mature its compliance activities across the organisation; This includes activities to prevent Modern Slavery in the business and its supply chain. Below details the progress made in the Financial Year 2020 -2021:

- Mandatory awareness of key performance indicators and process embedded
- AMS Global Code of Conduct issued annually to all staff requiring attestation to demonstrate understanding and a commitment to compliance to the content
- Modern Slavery & Human Trafficking Prevention (and detection) training deployed for all staff
- Continued promotion of the global whistleblowing channels to enable raising of concerns regarding the failure to adhere to the requirements of any AMS policies.
- All suppliers screened to meet minimum standards and expectations aligned to the detection and prevention of Modern Slavery.

Section 9 Summary

AMS is fully supportive of the Modern Slavery Act and its aims and will not knowingly support or deal with any business involved in slavery or human trafficking. It will continue to invest in compliance with its legal obligations.

Approved by the AMS Board of Directors



Signed _____

David Leigh – Chief Executive Officer

Date 23rd August 2021

Section 10 Document Control

Document Information

ITEM	
Title	Modern Slavery Statement June 2021
Document Type	Company Statement
Document Status	Draft
Document Classification	General
Author	Jill Rachlin
Owner	Risk & Compliance
Next Review Date	May 2022

Reviewer(s)

DATE REVIEWED	NAME – POSITION
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June 11, 2021	Paul Watters – Global Head of Risk & Compliance
June 17, 2021	Gordon Bull – Managing Director, Legal, Risk & Compliance

Version Control

DATE ISSUED	VERSION	REASON FOR CHANGE	AUTHOR	APPROVED BY
August 2021	V1.0	Review, Update and Rebrand	Jill Rachlin	David Leigh

Distribution

DATE DISTRIBUTED	VERSION	DISTRIBUTED TO
August 2021	V1.0	External Website



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