

Modern Slavery Act Statement

Introduction

This statement sets out The Sterling Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2015 to 31 March 2016.

As part of the Contracting Industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

As a market leader, Sterling hold preferred supplier status with major UK recruitment agencies, offering services enabling them to work more efficiently and cost effectively. We offer contractors in the temporary market the option to work PAYE through our Umbrella Company or sub-contract on a self-employed basis. We also offer a Limited Company service. All of our products ensure that contractors benefit from bespoke streamlined processes whilst maximising their income. Sterling outsource labour to all sectors and provide Personal Accident, Public Liability, Employers Liability as standard; and Professional Indemnity and Offshore insurance if required for the assignment.

At Sterling we take looking after our clients' needs very seriously. Compliance and customer service are at the forefront of our focus. We are an APSCo Affiliate Member, Professional Passport Approved which gives added reassurance that we do things properly.

Countries of operation and supply

The Company's head office is based in Warrington, Cheshire, UK. We have contractors working all over the UK and also in Norway.

We ensure that we only work with reputable agencies and clients when placing our contractors abroad. We ensure that the relevant documentation is in place and that the contractors have a full understanding of the requirements of the assignment.

Our supply chain consists of over 1,000 recruitment agencies of which terms of business are in place for each. Each recruitment agency has a rigorous contractual process and preferred supplier list criteria for companies like ourselves to remain on the PSL. In turn we have terms of business in place that safeguard our contractors when working on an assignment with the client.

Since the introduction of the Modern Slavery Act, terms have been/will be amended at renewal stage to include obligations on the client and agency to comply with the Modern Slavery Act.

We do not deem that any of the activities within the contracting industry are high-risk. Each contractor that is sub-contracted through The Sterling Group has their Eligibility to Work documentation checked to ensure that it complies with Home Office regulations. We also ensure the New Starter information provided by the contractor is unique to that individual such as bank account details, National Insurance number, and address etc.

We also ensure that any contractor is paid at least the level of National Minimum Wage in accordance with the rate in place at the time.

Responsibility and Due Diligence

Overall responsibility for the organisation's anti-slavery initiatives lies with the Board of Directors. The Human Resources Director is responsible for policy creation and training to all internal staff.

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

As part of the Company's initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chain;
- Mitigate or resolve any identified risk of slavery and human trafficking occurring in our supply chain;
- Monitor potential risk areas in our supply chain; and
- Protect whistle blowers.

The Sterling Group has a zero tolerance approach to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have rights of audit built in to our terms of business.

We have a dedicated compliance support team which consists of involvement from the following departments:

- Commercial Compliance
- Human Resources
- Business Analysis

Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.
- **Employee code of conduct** The Company's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking, the company requires all internal staff to complete training.

The company's modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;

- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the company will raise awareness of modern slavery issues by periodically emailing bulletins to its contractors and supply chain.

The bulletins will explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the company; and
- what external help is available, for example through the Modern Slavery Helpline.

Board/Member approval

This statement has been approved by the organisation's board of directors, who will review and update it annually.

Ian Black

Managing Director



Date: 1st January 2016