

Modern Day Slavery Statement

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

Company Overview

Alexander Mann Solutions is an international talent acquisition and management company headquartered in the UK and operating globally in over 80 countries. With over 4000 people around the world, we are passionate about delivering adaptable, world class, talent solutions in partnership with our clients; based on the fundamental belief that people are the foundation of our success. Alexander Mann Solutions is committed to a zero tolerance approach to Modern Day Slavery within our business and from within our supply chains.

We understand that we have a significant role to play in managing our business carefully and responsibly. We continuously focus on driving corporate responsibility through adopting appropriate policies, not only within Alexander Mann Solutions, but also within our global supply chain.

This Statement focuses on Alexander Mann Solutions' compliance with the Modern Day Slavery Act UK 2015 and highlights the steps we take to:

1. Ensure there is no modern day slavery occurring within our own business
2. Provide assurance that we take reasonable measures to mitigate the risk of modern day slavery occurring within our supply chains

This Statement is reviewed and updated annually in line with the legislative requirements set out in the Modern Day Slavery Act UK 2015.

Due Diligence Within Our Business

We meet our responsibilities through operating in a transparent environment. We are committed to acting with integrity and treating all individuals with fairness and respect; this is demonstrated through the way we conduct our operations in accordance with set principles, procedures, and policies as well as having appropriate governance and controls in place.

Our Global Code of Conduct outlines our values and the behaviours that we expect from all who work for or with Alexander Mann Solutions. Furthermore our Code of Conduct is the foundation upon which many of our Compliance policies and procedures are established.

In keeping with our commitment to act authentically in all our business dealings, several of our existing policies are relevant to support the requirement that there is no slavery or human trafficking in any part of our business or our supply chains; 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
- Training and Study Policy
- Environmental Statement and Policy

All of our policies are reviewed at appropriate, pre-defined intervals (unless a change to legislation is made ahead of this date), and are available for personnel to access at any time. Corresponding E-learning training and awareness activities are in place to ensure personnel understand how to comply with policy requirements. In specific relation to preventing modern day slavery, our policy and training includes the common warning signs that an individual subjected to modern day slavery may display.

Channels are available for personnel or suppliers to confidentially raise concerns regarding actual or suspected breaches to policy or behaviour that contravenes our Code of Conduct. We promote the concept that compliance is everyone's responsibility and take a zero tolerance approach to any form of retaliation to individuals who raise concerns in good faith.

Due Diligence Within Our Supply Chain

As a world leader in recruitment process outsourcing operating predominantly in the labour supply sector, we are very aware of our responsibility to inform and enable ethical and responsible business processes through principled procurement. Our fundamental approach is to build responsible practices into our standard procurement process, meaning that responsible procurement is simply seen as 'how we do business' rather than a standalone project.

We have invested in technology to drive our Procurement and Supplier Management objectives, and require our prospective suppliers to undergo appropriate levels of due diligence, this is supported by our online 3rd Party Assurance registration tool, this tool enables us to drive best standards in compliance.

AMS have a Supplier Code of Conduct that sets out the values, behaviours, and conduct that suppliers working with Alexander Mann Solutions are expected to demonstrate. The Supplier Code of Conduct sets out expectations for suppliers relating to the prevention of Modern Day Slavery. The code of conduct applies to all suppliers providing services to Alexander Mann Solutions.

Where suppliers do not meet our minimum prevailing standards, they are not able to enter our supply chain. Supporting the due diligence is our contractual framework. We engage suppliers on formal contracts which contain appropriate terms and conditions which mitigate the risk of poor or illegal practices from occurring with the supply chain.

Governance & Control

The Alexander Mann Solutions Head of Procurement is the owner of the Procurement and Supply Management Policy and the Global Head of Compliance is the owner of the Anti-Slavery & Human Trafficking Policy. The ownership of these policies ultimately reports to the Alexander Mann Solutions

Board of Directors. In line with legal requirements, the Alexander Mann Solutions Group Chief Financial Officer is responsible for presenting the annual Modern Day Slavery Statement for Board of Director approval.

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 HR to take action should an individual or group of individuals breach any of our policies.

Alexander Mann Solutions' Procurement & Supplier Management Team uses a risk-based approach to monitor implementation of and adherence to the Procurement and Supply Management Policy and its application in our supply chain.

Suppliers are expected to identify and correct any activities that fall below the standard of the AMS 3rd Party Assurance evaluation.

We reserve the right to terminate the business relationship with the supplier concerned in the event of a breach of contract or policy.

Our Preventing Modern Day Slavery Maturity Journey

Each year we continue to mature our compliance activities across our organisation; including due diligence to support the prevention of modern day slavery. Below details the progress made since the introduction of the Modern Day Slavery Act UK 2015.

Progress Financial Year 2018-19

- Implemented a best in class technology to facilitate the administration of supplier due diligence checks at the point of new supplier engagement. This allows us to better assess and mitigate risk in our supplier chain and include specific questions regarding the prevention of Modern Day Slavery.
- Implemented a Supplier Code of Conduct to set out all expectations that Alexander Mann Solutions has of its Suppliers, including the prevention of modern day slavery
- Continued promotion of the global Whistleblowing channels to enable raising of concerns regarding the failure to adhere to the requirements

Progress Financial Year 2017-18

- Anti-Slavery and Human Trafficking Policy written and implemented globally across our business
- Increased contractual obligations regarding the prevention of Modern Day Slavery flowed down to key supplier contracts
- Continued promotion of the global Whistleblowing channels to enable concerns regarding the failure to adhere to the requirements to be raised
- E-learning training module updated to include more specific scenario based examples to increase awareness and understanding levels within our business
- Our Global Code of Conduct issued to all staff and attestation to demonstrate understanding and compliance to the content was required

Progress Financial Year 2016-17

- SID4AMS Process enhanced to capture all new AMS Suppliers into the registration process through Procurement and Supply Management Policy
- AMS undertook benchmarking exercise through the HMG Modern Slavery Assessment
- Modern Day Slavery identified as requiring new internal policy formation through Compliance and Ethics framework with associated ELearning for all staff
- AMS invested in new global Whistleblowing technology due to be launched later in Q4 2017 to support a transparent and ethical culture with regards to any poor practices

Progress Financial Year 2015-16

- Modern Day Slavery Act – internal owner identified.
- Procurement and Supply Management Policy updated to include reference to Modern Day Slavery Act.
- Supplier Registration Platform identified as control process to drive supplier compliance and detailed phase action plan developed to implement and operate.
- Modern Day Slavery Act Statement prepared & published.

Summary

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

Approved by the AMS Board of Directors

Signed 

Jo Roberts – Chief Financial Officer

Date.....1 June 2019.....



Signed.....

Rosaleen Blair - Chief Executive Officer

Date.....1 June 2019.....