

# **Gattaca modern slavery statement**

## **for the financial year 1 August 2018 – 31 July 2019**

This statement is made on behalf of all companies and brands within the Gattaca Group, pursuant to section 54(1) of the Modern Slavery Act 2015, and constitutes our Group's slavery and human trafficking statement for the financial year ended 31 July 2019.

This statement was approved by the Board of Directors on 28 January 2020.

### **Introduction**

Our values underpin everything we do. They reflect our ambition and shape who we are as an organisation. These include striving to set an example, aiming to make a positive difference to everyone we work with and being accountable for everything we do.

These ways of working directly relate to the responsibility we take in our part to combat slavery and human trafficking issues.

### **Gattaca's structure and business**

Gattaca plc (Gattaca) is an international recruitment business providing outsourced staffing solutions and recruitment services to those operating in the engineering and technology markets.

Over 700 people work for Gattaca across an international network of offices spanning four continents.

The Gattaca Group consists of a number of specialist recruitment brands including:

- Matchtech; a leading engineering recruitment specialist;
- Networkers; a leading technology recruitment specialist;
- Resourcing Solutions; specialising in construction and engineering disciplines for Rail, Power and the Built Environment;
- Barclay Meade; specialising in professional staffing across commercial management, finance & accountancy, HR, procurement, sales & marketing and supply chain management; and
- Alderwood; providing permanent recruitment services within the skills and employability training markets.

As the parent company, Gattaca provides the infrastructure, tools and governance to the rest of the Group. The Group has a dedicated Legal & Compliance function to ensure compliance on legal and regulatory aspects of trading in the UK and internationally. All of our Group Support functions operate under the Gattaca brand.

We pride ourselves on our knowledge of the sectors we serve and our ability to build strong, lasting relationships with clients and candidates.

We share the same values and ways of working across all of our brands. Our vision is to be the leading provider of outsourced solutions and specialist recruitment in our chosen markets.

## **Gattaca's Supply Chains**

Our supply chain is comprised of suppliers who provide goods and services to the Group, as well as those who are involved in the services we provide to our candidates and clients. This includes payroll management companies, other recruitment agencies and workers who provide services via limited companies or as a self-employed consultant.

We have a zero tolerance approach to slavery and human trafficking in our business and our supply chain. We expect our suppliers to support the principles of the UN Global Compact, which is committed to 10 universally accepted principles, which includes human rights, labour, and anti-corruption. The Group, primarily through the CFO, General Counsel and Head of Group Compliance, review periodically our key suppliers (including banks, insurance companies and payroll suppliers). We will not work with any supplier organisation that has been found to have knowingly been involved in slavery or human trafficking.

As part of our contracting processes we include specific prohibitions against any form of slavery or human trafficking. We expect our suppliers to adhere to the same high standards, and take steps to ensure this approach is reflected in their supply chains.

## **Our policies**

Our Group Code of Professional Conduct (Code) outlines our core principles to act ethically and with integrity in all our business dealings and relationships. All employees are expected to adhere to the Code and its underlying principles. Specifically in reference to slavery and human trafficking, the Code sets out our commitment to implement, enforce and monitor effective systems and controls to ensure that neither slavery nor human trafficking is taking place anywhere in our business or in any of our supply chains.

Our Group Modern Slavery Policy addresses in further detail the responsibilities of all employees to prevent, detect and report any concerns of slavery or human trafficking in any part of our business or supply chain throughout their business dealings. This Policy also reflects our commitment to ensuring that any detrimental treatment toward an individual for speaking up about concerns of slavery or human trafficking is not tolerated.

Our Speak Up Policy confirms this commitment and provides a vehicle to enable employees to voice any concerns in a responsible and effective manner. Our independent 'Speak Up' hotline also offers employees the ability to report concerns, including slavery and human trafficking, on an anonymous basis.

Our Group Responsible Procurement Policy drives working together with suppliers for a positive social impact and outlines our focus on continuous improvement.

We have effective systems in place to investigate any concerns raised under these policies, and no slavery or human trafficking concerns have been raised to date. We continue to review the effectiveness of our internal controls via our Group Compliance & Ethics Framework.

## **Due diligence and risk assessment in the supply chain**

For most supply received into the business, we have a 'Group Supplier Approval Procedure'. The UK and each of our international offices manage their procurement locally in accordance with this Procedure. We categorise our suppliers according to the nature and volume of their service, and tailor due diligence and compliance processes accordingly. We operate an annual review process, which includes requesting an updated Modern Slavery statement from our suppliers, where applicable.

For high risk suppliers (such as those providing payroll services), we conduct thorough due diligence following which, each supplier must be approved prior to any entity in the Gattaca group engaging in any business with them. Each of these suppliers is required to enter into appropriate contractual obligations, which include the right of audit by Gattaca, and the requirement to comply with ongoing compliance monitoring and further due diligence requests. Our processes apply a number of controls to ensure that only approved suppliers are utilised, and then apply a programme of review annually for each supplier.

The nature of our business is to fulfil outsourced staffing solutions and recruitment services by supplying workers to clients. We carry out a number of compliance checks on prospective workers by way of due diligence, giving us comfort that we are placing candidates who voluntarily want to work, and getting access to their own pay. In the same vein, where safety could be a particular concern due to the nature of the role or the working environment, clients are asked a series of qualifying questions to ensure the safety of workers in the environment in which we are sending them to work. Any information is monitored by the Health & Safety department, and followed up, as necessary, with appropriate action.

Our consultants maintain contact with workers throughout the length of temporary or contract assignments to ensure the integrity of the placement and the safety of the worker.

Specific and appropriate steps are taken to mitigate higher risk placements. As an example, we are also licensed with the Gangmasters Labour and Abuse Authority (GLAA) with regard to any placements that fall under this requirement.

## **Training**

Our Modern Slavery training provides detail on potential warning signs of slavery and human trafficking and informs employees how to raise concerns. As many of our employees have touch points with our supply chain (specifically with contractors and payroll management companies) we consider it appropriate for all employees to be trained to the same standard and understanding, regardless of position and job title within the organisation.

## **Effectiveness in combating slavery and human trafficking**

To date, throughout the whole of the Gattaca Group, we have had no complaints of, or identified instances of, slavery or human trafficking. We manage a suite of leading and lagging key performance indicators in order to understand our level of risk in this area. These indicators include, but are not limited to:

- records of mandatory compliance training
- monthly review of reports to our Speak Up facility
- due diligence screening of payroll management service providers
- monitoring of contractual terms

Gattaca is committed to continuous improvements of the controls that we have in place to prevent slavery and human trafficking, including:

- continually monitoring, clarifying and enhancing our processes for placing contractors in risky areas to protect workers;
- implementing a new, single CRM, which will facilitate more 'in-system' control and involvement from Group Compliance;
- continuing to encourage use of our Speak Up facility;

- refining our programme of mandatory compliance training for internal employees and contractors on key slavery and human trafficking risk areas, including more engaging and effective training modules, and more robust monitoring of completion rates; and
- strengthening the engagement and communication methods of our Group Compliance department both internally and externally.



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Kevin Freeguard  
Chief Executive Officer  
Gattaca plc

Date: 28 January 2020