
Anti-slavery and Human Trafficking Statement 2017/18

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Austin Fraser Limited, a company registered in England with Company Number 05684470, and other relevant group companies ("Austin Fraser") during the financial year ending 28th February 2018 to prevent modern slavery and human trafficking in its business and supply chains.

Introduction from the CFO

At Austin Fraser, we consider modern slavery to be a growing global issue and know our clients and stakeholders share our concern. We are committed to adopting the highest business and ethical practices in all facets of our operations and interactions with clients and candidates to live up to our responsibilities in combating slavery and human trafficking.

Our policy framework and robust operational procedures covering staff education, compliance and engagement is reviewed by the Board of Directors at least annually along with an assessment of associated risks, regulatory requirements and best practice in this area. We will continuously assess the adequacy of our framework in this context to ensure we have the most effective responses and controls in place.

As a business, we maintain relationships with many different organisations in our supply chain, as well as supplying varying levels of contract, interim, temporary and permanent workers to clients. In the light of the general law on employment and human rights, and, more specifically, the UK Modern Slavery Act 2015, we have undertaken a comprehensive review of our existing compliance and risk management processes ensuring that we can prevent slavery and human trafficking taking place in any part of our businesses or supply chain world wide.

We expect all who have, or seek to have, a business relationship with Austin Fraser to familiarise themselves with our policy in this area and act at all times in a way which is consistent with our commitment to act ethically and with integrity.

We are publishing this statement to explain the work we have completed to date to combat modern slavery within our business and the steps we intend to take on an ongoing basis.



Matthew White
Group CFO
Austin Fraser
2nd October 2018

Our Structure

We are an international provider of recruitment services in the IT, technology, engineering and life sciences sectors. Austin Fraser Limited is the parent company of the Austin Fraser Group (“Group”). Austin Fraser Limited’s registered office is at Floor 11, Thames Tower, Station Road, Reading, Berkshire, RG1 1LX. The Group operates in the UK, Germany and the United States.

Our Supply Chains

As a service provider, our supply chains are limited to those individuals and organisations which provide us with the goods and services needed to operate our business, such as IT hardware, software and telecommunications; vehicles; office furniture, equipment and supplies; utilities; travel services; and training services. There is, therefore, limited scope for slavery and human trafficking to take place in Austin Fraser’s business or supply chain.

Our Policies on Slavery and Human Trafficking

Austin Fraser expects all employees to live by the “AF Code”. We expect all of our employees to ask themselves:

- Is what I'm doing fair and reasonable and not impacting anyone else?
- Am I being upfront and honest, would someone else see it that way?
- Am I breaking any AF policies or the law, or something that could cause embarrassment to me and/or Austin Fraser?

In addition we have implemented an Anti-slavery Policy. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes for Slavery and Human Trafficking

We review of all of our existing suppliers to identify and assess any potential risk and, where necessary, monitor and manage that risk. This review will then be repeated on an annual basis.

When assessing the risk we consider:

- Country risk - whilst we do not operate in countries that are assessed as being vulnerable to slavery and human trafficking, we will take this into consideration in supply chain relationships and transactions.
- Sector or industry risk - which parts of the business may be vulnerable to slavery and human trafficking.
- Business or transaction risk - whether particular relationships or transactions are susceptible to slavery and human trafficking.
- Product or raw materials risk - where raw materials are sourced.

We put in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.

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- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values we have put in place a supply chain compliance programme. This consists of:

- conducting and reviewing all risk assessments annually to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- Building long lasting business relationships with reputable suppliers, contractors and sub-contractors.
- At point of engagement with any new suppliers and during annual reviews, conveying our position regarding slavery and people-trafficking either as an introduction or as a reminder, and gaining an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
- Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
- Introduce contractual provisions for our suppliers to confirm their adherence to our Modern Slavery Policy and, where appropriate, accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- Inform and gain agreement from suppliers that we expect all members of our supply chain to at least adopt a 'one up' due diligence approach on the next link in the chain.

Training and Internal Processes

In the financial year ending 28th February 2018 we had the following policies in place to help ensure that there is no slavery or human trafficking in our supply chain:

- Disciplinary and Grievance.
- Equality & Diversity.
- The AF Code.

To ensure a high level of understanding of the risks of modern slavery and human trafficking to our business, we will provide training to those of our staff responsible for supplier contracts. This training will ensure that these staff can:

- Recognise the risks of modern slavery and human trafficking in the supply chain.
- Identify and report potential violations of our Modern Slavery Policy.
- Understand the consequences for failing to ensure that there is no modern slavery or human trafficking in the supply chains.

Adherence to Company expectations in terms of conduct, behaviour and performance forms part of all team members' obligations under their contract of employment and the AF Code.

At point of hiring, all new employees will be referenced and will undergo a Company induction and on the job training which will outline the processes and procedures.

All processes and procedures related to recruitment service provision (both internal and external) have been and will continue to be defined in such a way as to mitigate the risk of modern slavery occurring. These

processes will include (but will not be limited to) Right to Work Checks and provision of certain personal information before starting work.

We will establish an appropriate reporting system to encourage reporting of concerns and ensure the protection of whistleblowers in line with Whistleblowing legislation. We will implement a Whistleblowing policy which will cover concerns of Modern Slavery and/or Human Trafficking.

Our Effectiveness in Combating Slavery and Human Trafficking

In the financial year ending 28th February 2018 no concerns were raised in relation to modern slavery or human trafficking within our supply chain.

We will use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains in the current financial year:

- Vetting procedures - the number or percentage of suppliers that have been vetted for ethical labour practices.
- Screening - the number and type of issues identified on screening suppliers.
- Whistleblowing - the number of reports relating to modern slavery or human trafficking in the past year.
- Training - the number of staff trained.
- Remedial action - the instances of remedial action being needed.

Responsibility for Implementing a Modern Slavery Policy

A cross-functional team composed of representatives from Sales, Marketing, Finance, HR, Systems, IT and Operations will be established. This team will have functional knowledge and expertise of department specific policies, procedures and supplier relationships, and will therefore be best placed to:

- ensure those reporting to them understand and comply with this statement, and are given adequate, regular training on the issue of modern slavery.
- appropriately assess areas of risk within the departmental supply chain and general operations.
- work collaboratively to establish long term partnerships with reputable, tried and tested suppliers for the group irrespective of location.

Following its initial adoption, this Anti-slavery and Human Trafficking Statement will be reviewed by the Company's Directors and the cross functional team nominated by the business on an annual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Anti-Slavery and Human Trafficking Statement for the financial year ending 28th February 2018. It was approved by the Board of Directors on 2nd October 2018.