

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction from the Chief Executive

Brightwork is committed to improving our practices to combat slavery and human trafficking and developing and adopting a proactive approach to tackling hidden labour exploitation. All sourcing, recruitment and worker placement processes are under the control of trusted and competent employees and we have implemented, and embedded across the organisation, compliance principles to which all our employees are required to adhere.

The company provides a programme of training to employees, commencing at induction level, which includes awareness workshops on labour exploitation along with methods and best practice guidance on how to identify and deal with potential instances of human trafficking and third-party labour exploitation.

Brightwork adopts a proactive approach to reporting suspicions of hidden worker exploitation and encourages our workers to report cases of exploitation by providing them with information through leaflets and online communications, along with a safe and confidential means of reporting. Our employees are trained in how to investigate and act upon such reports. The organisations within our supply chain are required to adopt policies and procedures which are consistent with and uphold Brightwork's own policies.

We also continue to broaden awareness of the issue by encouraging and providing means to report exploitation which may be occurring in our workers' wider communities. Brightwork endeavours to continue to maintain the standards required as a sponsor and partner of the Stronger Together initiative.

Organisation's Structure

Brightwork was established in 2006 with the management buy-out of a division of Hudson Global by the senior management team. The organisation expanded with the acquisition and subsequent merging of further businesses from specialist to complimentary recruitment services organisations, thus creating an all-encompassing service offering for Brightwork's clients.

We are a provider of staffing solutions, with our services including sourcing, screening and appointment of workers for permanent, contract, interim and temporary assignments across a variety of sectors, i.e. logistics and distribution, supply chain, construction, property services, health and social care, hospitality and event catering, manufacturing, warehousing, office and business support services, sales, marketing, retail, engineering, technical, life sciences and production and operations management, operating across Scotland with offices in Edinburgh, Elgin and Glasgow.

Brightwork had an annual turnover of £38.2 million in 2017.

The Staffline Group acquired Brightwork in April 2017. The Group was first established in 1986 and Staffline has grown into a national organisation which provides and manages workforces and uses training and business improvement techniques to ensure increased levels of efficiency to provide clients a significant commercial advantage. In 2004 Staffline was floated on the Alternative Investment Market of the London Stock Exchange. The company had grown to 33 locations and a turnover of £48 million per annum.

Last year the network had grown to 400+ locations and the Group supplied 74 million hours of temporary labour to the UK labour market. The Group's turnover was now £957.9 million in 2017.

Our Business

Our business operates across a number of industry sectors including Food and Drinks, Industrial and Logistics, Health and Social Care, Facilities and Catering, Professional and Technical and Business Support Services.

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Our Supply Chain

Our supply chain includes:

- employment businesses providing temporary labour resources;
- IT systems and support providers;
- telecoms providers;
- stationers;
- waste management suppliers;
- property management agents and landlords;
- legal and financial service providers;
- job board and social media platform providers.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Slavery and Human Trafficking 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 chain.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we:

- where viable, build long standing relationships with our suppliers and make clear our expectation of business behaviour;
- identify and assess potential risk areas in our supply chain (via supplier approval assessment);
- have developed action plans to manage those suppliers which do not participate in or fail the supplier approval assessment;
- introduced a policy to ensure that workers of a particular nationality are not placed in the hands of an employee of the same nationality;
- have fixed agenda items regarding the issue included as part of client review meetings;
- instigated a formal process and documentation for reporting of suspected cases of human trafficking and other types of exploitation;
- introduced a requirement for workers to be interviewed unaccompanied by any third party, with access to an independent telephone interpreting service (at short notice) to assist in investigations or interviews if required;
- have a schedule of internal audits for assessing the application and effectiveness of the systems and processes being put in place;
- protect whistle blowers.

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 introduced a rigorous supply chain compliance programme. This consists of a supplier approval process which investigates suppliers' policies, procedures and documentation with regard to tackling and preventing the issue. The approval process is carried out in the first six weeks of initiating any new supplier relationship and is repeated at least annually with existing suppliers. The review is managed by the Compliance Specialist in conjunction with relevant members of the Group's Compliance Team. Any supplier which comes to Brightwork's attention for failing to adhere to the Modern Slavery Act 2015 will immediately have their supplier status removed and be reported to the relevant government body. Any supplier which fails to take a proactive approach towards tackling the issue will be considered for removal and advised of this.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we deliver comprehensive training to all employees and we require our suppliers to provide training to their own employees and supply chains. We also provide detailed information to all our temporary workers on how to access help and advice for victims or suspected victims of modern slavery.

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Our Effectiveness in Tackling Slavery and Human Trafficking

We 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 chain:

- number of Suppliers contacted and asked to complete the Supplier Approval Questionnaire;
- number of Suppliers responding and completing the Supplier Approval Questionnaire;
- number of Suppliers evaluated as acceptable;
- number of non-conformances raised during internal audits conducted by QA & Compliance Specialist;
- percentage of workers interviewed who fail the “Right to Work in the UK” validation process;

Further Steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chain we intend to continue to combat slavery and human trafficking by:

- requiring all organisations within our supply chain to respond to our supplier approval questionnaire and evaluate the responses;
- approaching all organisations within our supply chain which achieve approval status and encouraging them to adopt their own anti-slavery policies, providing assistance where necessary and/or requested;
- collaborating with our key, private sector clients to share and assess anti-slavery policies which they have in place for effectiveness and the potential development and improvement of our own policy to align with theirs;
- developing and delivering further means by which our workers may safely and securely report exploitation occurring in their wider communities.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking statement for the financial year ending 31 December 2019.

Derek May
Chief Executive
Brightwork Limited
17 January 2019