

Gattaca Modern Slavery statement

for the financial year 1 Aug 2017 – 31 Jul 2018

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 2018.

This statement was approved by the Board of Directors on 29 January 2019.

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 750 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; the UK's number one engineering recruitment specialist;
- Networkers; a leading technology recruitment specialist;
- Resourcing Solutions; specialising in construction and engineering disciplines for Rail, Power and the Built Environment;
- Cappo; offering resource solutions within the oil, gas and petrochemical markets;
- 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 and General Counsel, 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 Compliance Framework.

Due diligence and risk assessment in the supply chain

For supply received into the business, we have a 'Group Supplier Approval Procedure', and each of our international offices manages 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.

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, clients are also asked a series of qualifying questions to ensure the safety of workers in the environment in which we are sending them to work.

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.

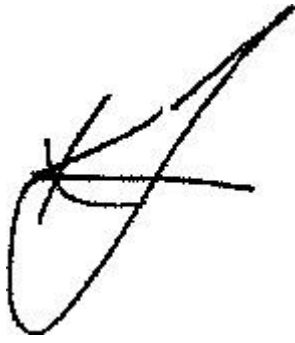
Training

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

Following a review of the effectiveness of the steps we have taken to date, we are committed to continuous improvement in our efforts to eradicate slavery and human trafficking, including:

- monitoring and enhancing our process for placing contractors in risky areas, including continual roll out of refreshed Sanctions training and implementation of new Sanction framework;
- refining our procurement processes and supply chain to provide more stringent controls in monitoring supplier's compliance;
- continuing effectiveness reviews of our internal training provision and policy (to include Modern Slavery, Anti-Bribery and Sanctions), and amending as necessary;
- monitoring relevant data from our Speak Up policy and hotline and addressing any concerns voiced regarding slavery or human trafficking in an appropriate and responsible manner;
- re-designing Group policies to be externally as well as internally facing, to allow us to be pro-active in our transparency and commitment to clients and our suppliers;
- driving greater communications to our workers on the purpose and location of our new Health & Safety Incident button to facilitate more effective reporting;
- continuing to invest in our operational compliance team to create more rigour in our screening and onboarding processes, paying particular attention to our compliance processes internationally;
- developing a GLAA framework to provide assurance in Gangmaster related responsibilities; and
- continual improvement in identifying, evaluating and managing risks.



Kevin Freeguard
Chief Executive Officer
Gattaca plc

Date: 29 January 2019