

Modern Slavery Act

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The Rullion Group (Rullion) requires the highest standard of business conduct in its relationship with its customer, suppliers, and others and strives to conduct its business in accordance with the highest standards of business ethics. According to research an estimated 21 million people worldwide, including children, are victims of forced labour. Everyone has a responsibility to work towards ending these conditions. Rullion is committed to conducting its business in a manner that ensures the absence of slavery and human trafficking in its supply chain.

In addition to Rullion's commitment described above, the Modern Slavery Act 2015 requires companies who transact business in the United Kingdom to disclose their efforts to eradicate slavery, servitude and forced or compulsory labour ("Slavery") as well as human trafficking from their supply chains and in their own businesses.

Rullion's Structure

The Rullion Group comprises of Rullion Ltd and all subsidiary and associated companies:

- Rullion Build Ltd
- Rullion Engineering Ltd
- Rullion IT Plus Ltd
- Rullion Resource Ltd
- Rullion Solutions Ltd

Registered in the UK, Rullion Limited was established in 1978 by Themis Saoulli. Over the last 40 years the company has grown rapidly to become one of the largest recruitment groups in the UK, covering a comprehensive range of skills and disciplines.

Rullion's business is focused on serving three core client markets:

- **Managed Solutions:** providing outsourced recruitment solutions (RPO, MSP, MV and NV) to a range of clients. Currently this division manages over £300 million of recruitment spend annually on behalf of our clients, and fills over 9,000 permanent, contract and temporary requirements each year.
- **Staffing Solutions:** working with clients to augment their talent requirements through the provision of flexible resource for specific projects and permanent recruitment solutions to identify and engage with hard to find candidates. Core markets served are Utilities, IT, Nuclear, Rail, Retail and Insurance.
- **Talent Consultancy:** supporting clients to enhance their in-house talent acquisition, assessment and on-boarding capabilities through a range of bespoke products and consultancy services.

Rullion's Policies in Relation to Slavery and Human Trafficking

Rullion expects and requires that each of its suppliers ("suppliers") conducts business in a lawful and ethical manner including business practices that prevent or eliminate slavery and human trafficking in its supply chain.

As part of our commitment to combating modern slavery, we have the following policies within our organisation:

- Ethical Business Policy
- Anti-Bribery Policy
- Whistleblowing Policy
- Dignity at Work Policy
- Equal Opportunities Policy
- Preventing Illegal Working in the UK

Our policies have been developed and adopted by Rullion to ensure that we conduct all business in an honest and ethical manner.

Due Diligence: Assessing & Managing Risk

While the large majority of Rullion's supply chain is not at risk of slavery and human trafficking taking place, Rullion nevertheless takes steps to assess and manage any risk. For example, Rullion identifies and utilises

suppliers who share Rullion's commitment to ensure the absence of slavery and human trafficking in its supply chain. While compliance is self-certifying, Rullion reserves the right for itself or through third party auditors, to conduct, or have conducted on its behalf, unannounced or announced audits of business practices to monitor suppliers' commitments.

Rullion ensures strict compliance checks are carried for all candidates it supplies. We verify the identity of each worker and their right to work before supply commences.

Training & Accountability

Rullion is committed to implementing and maintaining ongoing training of its employees and management on slavery and human trafficking to identify and mitigate these risks in its supply chains. Rullion also maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.

Our policies are regularly reviewed and communicated to staff to ensure our employees understand how to comply with all laws and act in accordance with regulations and act with integrity and honesty.

Our Supply Chains

Our supply chains primarily include sourcing candidates for clients. This may involve the introduction by external agencies to Rullion of candidates for onward supply to our clients. We expect the highest ethical standards from our suppliers and potential suppliers and that they operate in an ethical, legally-compliant and professional manner by adhering to our Modern Slavery Statement and terms of business. We also expect our suppliers to promote similar standards in their own supply chain. If we identify parts of our supply chain, where there is a risk of slavery and human trafficking, we will take the necessary steps to mitigate the risk.

By accepting purchase orders from Rullion, each supplier agrees to be bound by our policies. Among other assurances, this requires suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Other requirements include complying with environmental laws and regulations and applicable anti-bribery laws.

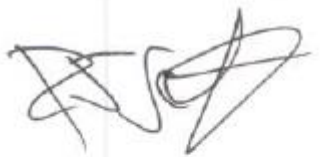
We work to exacting professional and ethical standards, whilst providing a highly responsive and personable service with a commitment to openness and integrity with clients and candidates alike. Rullion observes the highest principles of ethics, equity, professional conduct and fair practice in all its dealings.

Next Steps

We are committed to building on what we do, each year, to prevent modern slavery and human trafficking. Following a review of the effectiveness of the actions we have implemented, we intend to:

- Expand further on the training we provide to our employees
- Further increase the due diligence we carry out on new suppliers
- As part of our continual improvement programme, our strategy includes a review of our bids and tenders process to ensure we are dealing with ethically responsible clients

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Rullion's Modern Slavery Statement in respect of its 2018 financial year (1st January 2018 to 31st December 2018). It has been approved by the Board of Directors and is signed by Robert Scott, Group Vice-Chairman.



RS SCOTT

27/3/19