

# Modern Slavery Act Statement

## Modern Slavery Act

The Rullion Group (Rullion) requires the highest standard of business conduct in its relationships with its customers, suppliers, and others and strives to conduct its business in accordance with the highest standards of business ethics. According to research an estimated 26 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

Registered in the UK, Rullion Limited was established in 1978 by Themis Saoulli. Over the last 47 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.
- 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, Construction, Engineering and Financial Services.
- Talent Solutions: supporting clients to enhance their in-house talent acquisition, assessment and on-boarding capabilities through a range of bespoke products and consultancy services. Currently the

business as a whole manages over £300 million of recruitment spend annually on behalf of our clients, and fills over circa 5,000 permanent, contract and temporary requirements each year.

## 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:

- Anti-Modern Slavery Policy
- Ethical Business Policy
- Anti-Bribery Policy
- Whistleblowing Policy
- Dignity at Work Policy
- Equality and Diversity Policy
- Preventing Illegal Working in the UK Policy

The above policies have been developed and adopted by Rullion and are reviewed annually 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 at low risk of slavery and human trafficking taking place, Rullion nevertheless takes steps to assess and manage any risk. For example, Rullion carries out due diligence on all new suppliers before engaging with them to ensure it identifies and utilises suppliers who share Rullion's commitment to securing 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 audits or audits at short notice of business practices to monitor adherence to their commitments.

Rullion ensures strict compliance checks are carried out for all candidates it supplies. On no account will Rullion engage in any child or forced labour or inhibit any candidate's freedom of movement or association including freedom to change roles, agencies or employers. We verify the identity of each candidate including their age and their right to work before supply commences. If a candidate is a young worker (i.e. under 18 years of age) we draw their attention to the specific provisions in our Health and Safety Booklet (which is provided to all workers we supply) relating to limits on their working hours and rest periods, and to training, supervision and ensure the client hirer is aware of their obligations to young workers. We check payments are being made to the candidate's own bank account and that there are no duplicate bank details in our payroll system and instruct

our staff on identifying potential signs of modern slavery and exploitation and how to escalate and/or report any concerns they may have relating to modern slavery or human trafficking.

## Training & Accountability

Rullion is committed to implementing and maintaining ongoing training of its employees and management on slavery and human trafficking to ensure the Rullion workforce is able to identify signs of modern slavery and understands how to act if they do so. Rullion is also committed to mitigating these risks in its supply chains and requires its suppliers to provide evidence of their adherence to Rullion's policies.

Rullion also maintains internal accountability standards and procedures for employees and contingent workers and contractors failing to meet company standards regarding slavery and trafficking. Breaches by employees of Rullion's Anti Modern Slavey Policy are addressed under the company disciplinary process. Any supply chain concerns or allegations relating to modern slavery or human trafficking raised in the course of Rullion's supply of its recruitment services are investigated in line with this Anti Modern Slavey Policy and under our complaints procedure and such other policies as may be relevant in the circumstances. Our policies are regularly reviewed and communicated to staff through training and briefings to ensure our employees understand how to comply with all laws and to act in accordance with regulations as well as with integrity and honesty.

## Our Supply Chains

Our supply chains primarily include sourcing candidates for clients and supplying candidates on a contingent basis to work for clients on a temporary or contract basis. This may involve the introduction by external agencies to Rullion of candidates for onward supply to our clients. We expect the highest ethical and compliance standards from our suppliers and potential suppliers and adherence 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 have concerns about 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 including contacting the Modern Slavery Helpline and/or conducting a visit to the relevant client site.

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, equality, professional conduct and fair practice in all its dealings.

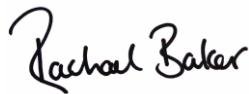
## Next Steps

We are committed to building on what we do, each year, to prevent modern slavery and human trafficking in our supply chain. Following a review of the effectiveness of the actions we have implemented we have implemented to date the following steps in preparation for the 2024 / 2025 financial year:

- Revised and enhanced the information and training we provide to our employees.
- Recognised as a Real Living Wage Service Provider for our on-going commitment to the Living Wage by the Living Wage Foundation.
- As part of our continual improvement programme, reviewed our processes to ensure they meet the expectations of our potential and existing clients and reviewed our due diligence processes to ensure we are dealing with ethically responsible suppliers and 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 2024 financial year (1st January 2024 to 31st December 2024). It has been approved by the Board of Directors and is signed by Rachael Baker, Chief Operating Officer.

Signed:



Name: Rachael Baker

Dated: 14<sup>th</sup> January 2025