

# Gattaca modern slavery statement

for the financial year 1 August 2021 – 31 July 2022

This statement is made on behalf of all companies and brands within the Gattaca Group which includes Gattaca plc, Matchtech Group (UK) Ltd, Networkers International (UK) Ltd, Resourcing Solutions Ltd, Barclay Meade Ltd, Alderwood Education Ltd, Gattaca Projects Ltd, Cappel International Ltd, Gattaca Solutions Ltd, Networkers Inc, Networkers International (Canada) Inc, Gattaca Information Technology Services SLU, Gattaca GmbH, Gattaca BV, Gattaca Services South Africa Proprietary Ltd, Cappel Inc, Connectus Technology Ltd, Comms Resources Ltd, Networkers International South Africa Pty Ltd 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 2022.

**This statement was approved by the Board of Directors on 6 December 2022.**

## Introduction

Our values underpin everything we do. They reflect our purpose and strategy, and shape who we are as an organisation. These include doing the right thing, maintaining high standards in what we do internally, and how we deliver externally – helping towards building a better future.

These ways of working directly relate to the responsibility we take in our part to combat modern 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 500 people work for Gattaca across an international network of offices spanning three continents.

The Gattaca Group (Group) consists of a number of specialist recruitment brands including:

- Matchtech; a leading engineering recruitment specialist;
- Networkers; a leading technology recruitment specialist;
- Resourcing Solutions; specialising in construction and engineering disciplines for Rail, Power and the Built Environment;
- Barclay Meade; specialising in professional staffing across commercial management, finance & accountancy, HR, procurement, sales & marketing and supply chain management;
- Alderwood; providing permanent recruitment services within the skills and employability training markets; and

- Gattaca Projects; providing innovative statement of work solutions for clients across a wide spectrum of engineering and technology sectors.

As the parent company, Gattaca provides the infrastructure, tools and governance to the rest of the Group. The Group has dedicated Legal, Compliance and Company Secretarial functions 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 STEM talent partner of choice; our mission is to every day deliver a service that is so trusted that our clients, candidates, colleagues and suppliers recommend us without hesitation.

## - 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 modern 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 modern 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 in line with our policies, and we continue to review the effectiveness of our internal controls via our enterprise Risk Assurance programme and regular Group Compliance reporting.

## - 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 other recruitment agencies, workers who provide services via limited companies or as a self-employed consultant and payroll management or umbrella companies which are higher risk suppliers.

We have a zero-tolerance approach to slavery and human trafficking in our business and our supply chain. The Group, primarily through or with oversight from the Senior Leadership team, periodically review our key suppliers (which includes insurance companies, financial service providers, recruitment agencies, payroll management and umbrella companies and workers). 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 modern 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.

## Due diligence in the supply chain

For most supply received into the business, we have a Group Supplier Approval Procedure. The UK and each of our international offices manage 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.

For high-risk suppliers (such as those providing payroll services), we conduct thorough due diligence, following which each supplier must be approved prior to any entity in the Group engaging in any business with them. Each of these suppliers is required to enter into appropriate contractual obligations, which include the right to audit by Gattaca, and the requirement to comply with ongoing compliance monitoring and further due diligence requests. Our processes apply a number of controls to ensure that only approved suppliers are utilised, and then apply a programme of periodic review for each supplier.

## Risk assessing our business

The nature of our business is to fulfil outsourced staffing solutions and recruitment services by supplying workers to clients. At the point of taking a vacancy and at fulfilling that vacancy, we operate a placement risk check process. This enables us to identify any high-risk countries, ensuring that we don't support any business in such locations.

We carry out a number of compliance checks on prospective workers, giving us comfort that we are placing candidates who voluntarily want to work, and are getting access to their own pay. This includes maintaining governance and oversight of any PAYE workers engaged via a Limited Company that we are contracting with on a consultancy basis.

In the same vein, where safety could be a particular concern due to the nature of the role or the working environment, clients are asked a series of qualifying

questions to ensure the safety of workers in the environment in which we are sending them to work. Any information is monitored by the Health & Safety department, and followed up, as necessary, with appropriate action.

We 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 licensed with the Gangmasters Labour and Abuse Authority (GLAA) with regard to any placements that fall under this requirement, and we are a member of the Railway Industry Supplier Qualification Scheme (RISQS) which verified that we operate as an ethical business, to supply into a high-risk environment.

## - Key Performance Indicators

Regular reporting is produced for our Senior Leadership Team, the PLC Board and the Audit Committee. This reporting will include any instances of modern slavery identified within our supply chain, breaches of our controls in place to help manage the modern slavery risk, modern slavery training completion stats and whistleblowing notifications made by employees of a modern slavery nature. (The reporting of any whistleblowing notifications acknowledges any anonymity and/or confidentiality required and may therefore only include volume of instances).

## - 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

We manage a suite of leading and lagging measures in order to understand our level of risk. These indicators include, but are not limited to:

- risk and control effectiveness monitoring;
- records of mandatory Modern Slavery training to ensure new starters are aware of the warning signs;
- real time review and regular analysis reports to our Speak Up facility;
- due diligence screening and ongoing auditing of payroll management service providers;
- maintaining our Gangmaster and Labour Abuse Authority license; and
- monitoring of contractual terms with clients, suppliers, contractors and employees.

In the last financial year in particular, we have taken several steps to continue combatting modern slavery and human trafficking. We have:

- made a key focus of significantly embedding our Group values into the DNA of our business, which define the behaviours we endorse, and those that we actively discourage to underpin our purpose, mission and vision;
- continued to maintain structured comms and awareness campaigns of our internal whistleblowing facility (Speak Up) in a way that is engrained in our business;
- engaged with a specialist third party to audit umbrella worker payslips;
- commenced implementation of third-party screening software which includes monitoring of modern slavery related offences; and
- developed internal CRM reporting mechanisms to enable forensic analysis of placements for high risk factors.

Gattaca is committed to continuous improvements of the controls that we have in place. For the next financial year, our focus in preventing slavery and human trafficking will be:

- continually monitoring, clarifying and enhancing our processes for engaging with clients, umbrellas, payroll management companies and placing contractors in risky and non-risky areas, in order to protect workers;
- reviewing the scope of our Speak Up facility;
- improving internal modern slavery training for employees;
- creating a supplier code of conduct to enable all suppliers to support our business in combatting modern slavery;
- improving our contractor engagement strategies which will improve opportunities to spot modern slavery red flags; and
- launching a new leader and manager workshop to develop skills to manage compliance areas within business units, which will include Modern Slavery risk.

A handwritten signature in black ink that reads "Matthew Wragg". The signature is written in a cursive, flowing style.

Matt Wragg - Chief Executive Officer - Gattaca plc

Date: 7 December 2022