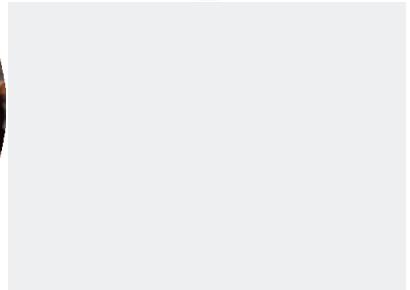
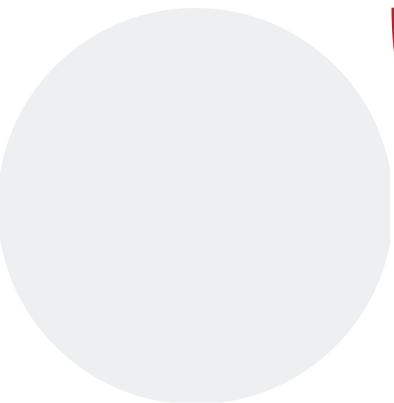


Modern Slavery Statement

November 2025



Leading.
Trusted.
Changing lives.



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Introduction

Modern Slavery is a criminal offence and has various guises such as slavery, servitude, forced labour and human trafficking. This violation of human rights is abhorrent and Staffline has a zero-tolerance approach to Modern Slavery, exploitation, and human trafficking.

As a leader in recruitment, Staffline Group PLC (“Staffline”) is committed to creating ethical employment opportunities. We take our responsibility seriously, striving to disrupt exploitation and tackle Modern Slavery, ensuring worker welfare is central to everything we do. We believe that working to prevent Modern Slavery is one of our highest priorities and we work alongside other businesses, charities and organisations that take this matter as seriously as we do.

For over 9 years, Staffline has published annual Modern Slavery Statements, outlining our aims, objectives, and preventative measures. Our commitment aligns with the Ethical Trade Initiative (ETI) base code guidance, and we continually review and improve practices in accordance with these standards. We strive to effectively consider the ETI ‘Principles of Implementation’ throughout our Modern Slavery Statement review, utilising continuous improvement plans and review mechanisms throughout the year.

We are, however, aware this is an ever-evolving crime, and its nature is complex and ever changing. The current economic climate, and ongoing global conflicts and crisis are still prevalent in our minds. These scenarios create opportunities for exploitation and Modern Slavery, where vulnerable people are keen to provide for themselves and their families. It is devastating to know that criminals see this as an opportunity for financial gain through various means such as promising guaranteed work, housing, and transport, to name just a few.

Our experience grows year after year, working closely with the Gangmasters Labour Abuse Authority (the ‘GLAA’, and soon to be the Fair Work Agency), the Home Office, the police forces across the country, and through collaborating and sharing insights with anti-slavery networks in all regions of the UK. Staffline supports working together to eradicate this criminal activity, sharing valuable insights that enable us to refine our compliance measures and enhance our safeguards and target our training across our business.

At Staffline, we are committed to providing a safe, secure environment where individuals can thrive. We are honoured to support survivors of Modern Slavery, working closely with multiple agencies to provide opportunities for fair and safe working environments for all.

About Us

Founded in 1986, Staffline has grown into the UK's leading provider of flexible, temporary, and permanent workforce solutions, enabling an average of over 35,000 people into good work each week, we have established ourselves as a trusted recruitment partner. We operate across a varied client range nationwide, delivering customised workforce solutions for diverse sectors such as automotive, manufacturing, food production, logistics, and driving. Working closely with clients to meet their unique business needs while ensuring candidates are matched with reputable employers for meaningful job opportunities.

Our recruitment process is supported by a team of experienced recruiters and innovative technology, including our bespoke candidate management tool, 'Universe', and the 'Have Your Say' our industry leading customer experience management platform, which enhance worker satisfaction and retention. Alongside our integrated AI chat bot technologies which offer assistance and promptly address inbound queries, ensuring our candidates and workers are directed to the appropriate destination on their first attempt.

With a commitment to best in class compliance and the highest of ethical standards, Staffline's vision is to remain the UK's most trusted recruitment business, helping businesses find the right talent while enabling individuals to succeed in secure and rewarding work environments. This embeds our culture and philosophy within our brand purpose of 'Enabling people into good work'.

Staffline Organisational Structure and Supply Chain

Staffline operates with a structured, division-based approach, providing specialised recruitment and workforce solutions. Staffline has 3 divisions: Staffline Recruitment GB, Staffline Recruitment Ireland, and Datum RPO. Our Brightwork business operating in Scotland is a subsidiary of Staffline Recruitment GB, and the Omega and A La Carte operations are trading names of Staffline Recruitment GB.

Recruitment GB: This division focuses on supplying temporary and flexible staffing solutions across various sectors in Great Britain (as Staffline, Brightwork, and Omega), managing an average of around 35,000 workers weekly. Staffline operates at approximately 450 client sites, offering on-site staffing and recruitment process outsourcing.

Recruitment Ireland: Catering to the Irish market, this division delivers tailored recruitment services across multiple industries. It provides both temporary and permanent staffing and maintains around ten branch offices and ten on-site client locations across Ireland, supporting over 4,500 employees per day.

Datum RPO: Specialising in managed service provider solutions, Datum RPO helps clients manage their temporary workforce, ensuring compliance and operational efficiency while providing full visibility on workforce spending.

For more on our structure please visit the [Staffline Group Plc website](#).

Overall, Staffline's structure is designed to support large-scale workforce needs and maintain strong client partnerships by providing comprehensive, industry-specific ethical recruitment solutions. The company continues to integrate technology and uphold ethical practices across all divisions, reinforcing its commitment to worker welfare and compliance standards.

With experienced, dedicated teams whose primary purpose is to review risk of Modern Slavery throughout our business and to ensure that we uphold the government Modern Slavery strategy aims:

1. Pursue: with our clients, our supply chain and a range of NGO's who share our values we collaborate on identifying and tackling this abhorrent crime and support prosecutions for any Modern Slavery offences.

2. Prevent: by educating our stakeholders in identifying any red flags, ensure our policies and processes are robust and reviewing our risks and addressing those appropriately.

3. Protect: our workforce in its entirety, our business and our supply chain by analysing data and identifying and reporting concerns.

4. Prepare: an established framework to identify and support victims with appropriate effective actions driven by the individual. In addition, support reintegration of victims ensuring appropriate support functions and safeguards are in place.

Staffline, Brightwork, and Datum RPO are GLAA-licensed businesses, and are committed to working only with partners who share our high standards, adhering to the GLAA licencing standards and this is demonstrated by our ISO 9001 (Quality Management System) and ISO 14001 (Environmental Management System) certifications, our EcoVadis Bronze rating, and our partnership with ethical recruitment initiatives like the Responsible Recruitment Toolkit.

By integrating technology and maintaining close relationships with stakeholders, Staffline ensures robust supply chain operations that support both worker welfare and client satisfaction.

Where any instances of exploitation or Modern Slavery are identified in our supply chain, we encourage all parties to work with us and relevant authorities to identify any root causes and ensure all effected individuals were identified and supported. As a final resort, we will cease any engagement with a supplier should they refuse to address and remedy any identified Modern Slavery concerns appropriately and work with relevant parties to engage with any affected/impacted individuals.

Our Focus

Staffline is committed to delivering responsible ethical recruitment solutions to a range of private and public services to find and support people into employment and develop skills. We do this through fair and clear terms, development opportunities, an equal opportunities policy for all, and safe, respectful, clean, and healthy work environments.

Our Values

Staffline's goal is to support people into good work to enable our workforce and our customers to fulfil their goals and aspirations. We achieve this through our company values and our human-centric approach, and this is embedded in our daily behaviours and our work with stakeholders.

At the heart of our business are the individuals we support into work; for example, by implementing AI technology we have improved our job search facilities to support the individual to 'Find Me Work', and we will continue to innovate. These dynamic solutions allow us to focus on an individual's journey, identify any concerns, and provide support along the way.

We have a forward-thinking and market-leading People team who work hard to help embed the culture of Staffline, promoting important topics such as Women in Leadership, Pride Month, Mental Health Awareness, Neurodiversity Celebration Week, and Anti-Slavery campaigns.

Throughout 2025 we have worked collaboratively with partners and focused on supporting Modern Slavery cases, providing more employment opportunities and working with our valued customers.

Staffline across its portfolio have increased our employment opportunities 14.5% (based on the number of hours of work completed), we remain worker centric and ensure individuals' requests are respected. We have worked collaboratively with clients and authorities on several suspected Modern Slavery cases and will continue to work in collaboration with likeminded businesses. In 2025-2026 we plan to review our risks and formulate a 5-year plan to ensure we target key areas, including improved training for key roles, supply chain reviews and wider stakeholder engagement.

Our commitment to eradicating Modern Slavery permeates our operations and supply chains, underscoring our unyielding commitment against slavery and human trafficking. We uphold our brand values consistently throughout our business practices and refuse to partner with any organisation that engages in slavery or human rights violations.

Policy Statement

Staffline has a zero-tolerance approach to Modern Slavery and human trafficking in all our operations and supply chains. We acknowledge that slavery and human trafficking are serious human rights abuses that have no place in modern society.

We will conduct our business with integrity and will not knowingly support or deal with any business involved in slavery or human trafficking. We expect our suppliers, contractors, and other business partners to share our commitment to preventing slavery and human trafficking.

To fulfil our commitment, we will:

1. Conduct due diligence checks to identify and assess potential Modern Slavery risks in our operations and supply chains.
2. Take appropriate action to address any identified risks and work with our suppliers and partners to improve their practices.
3. Provide training for our employees and suppliers to increase awareness of Modern Slavery and how to identify and report any potential cases.
4. Support our customers and suppliers by sharing our experiences to help with their employee awareness and policy/processes development.
5. Encourage and support the reporting of any suspected cases of Modern Slavery and human trafficking.
6. Regularly review and monitor our policies and practices to ensure that they remain effective in preventing Modern Slavery and human trafficking.
7. Protect our employees against any human rights violations, their freedom of movement and association, against unfair recruitment practices and ensure they have access to internal and external grievance mechanisms.

We are committed to continuously improving our efforts to prevent Modern Slavery and human trafficking and to comply with all relevant laws and regulations.

Our company policies are hosted on a live environment for all employees to access at any time and are supported with the additional awareness-checking learning materials on our learning experience platforms and support our commitment to protect human rights and eradicate Modern Slavery and unethical practices.

Due Diligence

Staffline conducts rigorous due diligence across all labour supply chains to ensure alignment with our ethical standards and values. We take decisive action in response to non-compliance and actively support suppliers in meeting our high expectations through education, engagement, and risk-based assessments. These assessments are aligned with the UK Government's Modern Slavery Assessment Tool (MSAT), ensuring consistency and accountability across our operations.

Our group-wide modern slavery due diligence strategy is designed to proactively reduce risks of forced labour and human trafficking. We collaborate with NGOs, regulatory authorities, and key stakeholders to share insights and implement adaptive development plans. Technology plays a central role in our approach, enabling us to identify red flags through data analytics, audit reports, and intelligence gathered by our internal investigations team. This allows us to apply lessons learned from real-world case studies, ensuring human rights protection remains at the core of our operations.

In recent years, the Group has achieved several key certifications and recognitions that reflect our commitment to continuous improvement:

- **ISO 9001** (Quality Management System) certification
- **EcoVadis Bronze Medal** in 2025, placing us in the top 35% of assessed companies
- **ISO 14001** (Environmental Management System) certification
- Plans in place for **ISO 27001** (Information Security Management System) certification in 2026

Staffline is registered with Sedex and has completed the Self-Assessment Questionnaire (SAQ), which evaluates site practices on labour, health & safety, and other social risk areas. Our current 'management controls' score is rated as 'Good.' Staffline has a current 4-Pillar SMETA audit, conducted by an accredited external auditor. This unannounced audit spanned two days and included visits to four operational sites and our head office. The process involved interviews with a representative sample of workers and discussions with relevant employees, providing a comprehensive view of our practices.

Our approach is aligned with key international frameworks and standards, including:

- The **UK Modern Slavery Act**
- The **UN Guiding Principles on Business and Human Rights**
- The **OECD's Six-Step Due Diligence Framework**
- The **CCLA Modern Slavery UK Benchmark**

Training & Awareness

At Staffline, educating and engaging all stakeholders is central to our efforts against modern slavery.

Across Staffline, all new team members complete mandatory training via our online platform. Supplementary training is delivered based on role-specific risks and operational needs, ensuring our workforce remains informed and vigilant.

During induction, workers receive comprehensive information supported by our multilingual Worker Handbook—available in ten languages—which includes guidance on accessing help and support. This resource is routinely reviewed to strengthen modern slavery content and includes signposting advice to external support services.

Our **7 Red Flags** programme simplifies the identification of modern slavery indicators and reinforces awareness across our teams and wider stakeholder network. This initiative is promoted through various communication channels, including our website, social media platforms, and marketing materials. It empowers individuals to recognise, and report suspected cases, fostering a culture of open reporting—even in instances where evidence may be limited. The programme aligns with the **International Labour Office's Indicators of Forced Labour**, ensuring consistency with global standards.

Suspicions of modern slavery are promptly escalated to our dedicated Investigations team, which includes professionals with backgrounds in law enforcement and regulatory compliance, including the Gangmasters and Labour Abuse Authority (GLAA). This team conducts impartial investigations, responding to intelligence leads and complaints to safeguard worker welfare and uphold regulatory compliance across Staffline.

Members of our Investigations team receive specialist training, including the Stronger Together Advanced Tackling Modern Slavery in Business course, to enhance their expertise. The quality of our intelligence sharing has been acknowledged by the Home Office and commended by other authorities in recent years.

Staffline strictly prohibits any form of payment for employment, as well as the retention or withholding of personal identity documents. We unequivocally reject forced or bonded labour practices, and any allegations are thoroughly investigated by our internal team.

In addition, we run awareness campaigns targeting potential workers to educate them on employment scams and criminal behaviours. These campaigns form part of our broader commitment to combatting modern slavery in all its forms across our operations and supply chains.

KPIs & Risk Assessments

Across our portfolio, we maintain a comprehensive approach to monitoring and reporting our efforts to prevent modern slavery and human trafficking. We have established business-specific performance indicators, all aimed at tackling modern slavery and evaluating the effectiveness of our actions. We recognise that certain sectors within our operations—such as food processing and warehousing—are inherently higher risk. Our diverse workforce includes migrant labourers who may be more vulnerable due to limited awareness of their rights.

In response, Staffline has:

1. Developed bespoke training sessions tailored to high-risk sectors and vulnerable demographic groups.
2. Optimised our UK-based labour pool, significantly reducing reliance on overseas labour agencies.
3. Established auditing protocols to ensure rigorous oversight should external labour sourcing resume.

We are committed to proactively identifying cases of modern slavery, and evaluate our effectiveness, we have established targeted performance indicators across Staffline:

1. **Modern Slavery gap analysis** of our overarching business operations, informed by the UN Guiding Principles on Business and Human Rights, CCLA's Modern Slavery Benchmark, Stronger Together directives, and the ETI Base Code.
2. **Self-assessed scored reviews** conducted at site level to identify and address operational risks.
3. **Enhanced screening questions** embedded throughout the worker engagement process to detect potential indicators of exploitation.
4. **Detailed tracking of investigation cases**, including time-to-resolution metrics, initiated in 2022 to improve responsiveness and accountability.
5. **Maintenance of Modern Slavery training** delivery above 95% for all staff across Staffline.

A key measure of our success is the number of investigations conducted and the identification of potential victims of modern slavery within our business. Given the scale and scope of Staffline's operations, we acknowledge the risk of being targeted by criminal actors seeking to exploit our workforce. Our systematic review of cases over the years has provided valuable insights and reinforces our commitment to delivering robust training, fostering open reporting, and implementing preventative measures to combat this crime.

Collaboration & Communication

Staffline maintains consistent and transparent communication with suppliers, customers, and stakeholders to reinforce our commitment to preventing modern slavery and human trafficking in recruitment practices. Through collaborative engagement, we identify, mitigate, and address risks while sharing best practices across our network. Our experienced teams work closely with external HR and management teams to enhance awareness, identify support mechanisms, and implement effective processes.

We maintain strong working relationships with the Gangmasters and Labour Abuse Authority (the 'GLAA', soon to be the Fair Work Agency) and other relevant authorities, promptly reporting all cases or suspicions of modern slavery offences. This diligence has earned recognition for the quality of intelligence and support provided to both authorities and affected individuals. In 2023, intelligence shared by our Investigations team contributed to over 15 cases progressing to criminal proceedings, increasing to 19 cases in 2024, with 10 directly resulting from Staffline's intelligence.

Preventing infiltration by unlicensed gangmasters remains a priority. We regularly engage with enforcement bodies and charities—including Migrant Help, Hope for Justice, City Hearts, local councils, and police teams—to tackle exploitation. As active participants in the Stronger Together initiative, we utilise the Responsible Recruitment Toolkit to embed ethical recruitment practices across Staffline.

When victims are identified, we collaborate with enforcement authorities and support organisations to ensure a victim-centric approach. Over the past four years, we have successfully supported 47 survivors of modern slavery, offering employment opportunities across our network. We also conduct case reviews with the Police and GLAA, involving other labour suppliers and customers where appropriate, to enhance collective learning and improve future responses.

Our compliance reports provide valuable insights, which we share with local authorities. These include indicators of potential exploitation such as illegal houses of multiple occupancy, overcrowding, and shared bank account or telephone details. This proactive approach has helped prevent welfare issues and contributed to the apprehension of perpetrators.

As business partners with Stronger Together, we implement their practical guidance throughout our organisation. Our Investigations team and Governance Director have completed advanced training in tackling modern slavery, and we adhere to the Labour Provider/Recruitment Business Good Practice Implementation Checklist, reviewed annually.

We are proud of our partnerships with charities and organisations such as Hope for Justice, West Midlands Anti-Slavery Network, Unseen, and City Hearts. Through these collaborations, we provide reconditioned devices and work placements to survivors, helping them rebuild their lives with dignity and purpose.

Our involvement in anti-slavery networks continues to grow, with more organisations joining our efforts each year. We work closely with OnePay, an approved alternative payment solution for our workers, to investigate any suspicions of modern slavery or fraudulent account usage swiftly and thoroughly.

In 2024, we hosted approximately 200 attendees across six roundtable events focused on modern slavery, bringing together leading businesses to share insights and strengthen collective action. Our worker rights leaflet continues to be used by other organisations to raise awareness of labour rights and

expectations for working in the UK. We continue to expand these events and build business communities that share our commitment to ethical recruitment and worker protection.

A key example of our collaborative impact is the Scotland Against Modern Slavery (SAMS) initiative, fully funded and operated by Staffline and Brightwork in partnership with Police Scotland, the GLAA, and the Scottish Government.

With over 60 businesses now involved, SAMS aims to:

- Raise awareness of exploitation within the Scottish business community.
- Support survivors with meaningful employment opportunities.
- Engage vulnerable communities to prevent exploitation.

Collaboration remains central to our strategy. By fostering open communication, sharing knowledge, and exchanging best practices, Staffline continues to strengthen its collective ability to combat modern slavery and make a meaningful impact across the UK.

Governance & Oversight

Our policies and accountability mechanisms are central to effectively identifying, preventing, and addressing modern slavery risks across our operations. In 2023, Staffline implemented a comprehensive Quality Management System, achieving ISO 9001 certification, and further strengthened our governance framework by achieving ISO 14001 (Environmental Management Systems) in 2024, strengthening our policies and procedures to ensure sustainable and ethical practices.

Our board of directors is committed to fostering a culture of zero tolerance towards modern slavery, and this commitment is clearly communicated across the business, a stance that is clearly communicated throughout the organisation. Ethical behaviour is a core value across Staffline, and we are dedicated to upholding these standards in every aspect of our business.

The governance/compliance functions within each trading division produce an annual Modern Slavery Statement, maintain GLAA licenses in place, and oversee the implementation of our anti-slavery policies and procedures. We maintain a centralised repository of company policies, ensuring full visibility and access for all staff. Regular communications via multiple digital channels ensure consistent awareness and understanding of policy updates and organisational principles.

Staffline has submitted an annual Modern Slavery Statement for more than nine consecutive years, with ongoing reviews and improvements that demonstrate our commitment to transparency and accountability. We keep stakeholders informed of our progress and future plans, and our Environmental, Social, and Governance (ESG) Report outlines our dedication to creating a positive impact on people, communities, and society. This public reporting reflects our continuous efforts to build a responsible, ethical, and socially conscious organisation.

Our internal review processes drive continuous improvement, including regular updates to our Modern Slavery Statement and supporting policies and procedures, to comply with the UK Government statutory guidance to cover six key pillars. We are committed to implementing effective, meaningful changes to continue to tackle Modern Slavery across our business.

Our Investigations team conducts root cause analysis and implements continuous improvement measures and training across our company. Where appropriate we endeavour to remedy and support any individual to seek justice and compensation.

Our Commitment

Staffline is fully committed to strengthening our efforts to prevent modern slavery and human trafficking. We recognise the complexity and evolving nature of these crimes, which often involve sophisticated criminal networks and pose significant risk to supply chains and vulnerable individuals. As such, we remain vigilant and proactive in implementing comprehensive safeguards to protect our workforce and uphold our ethical standards.

Preventing exploitation is a top priority for Staffline. We invest in robust measures to identify, mitigate, and respond to modern slavery risks, and we continuously assess our operations to ensure transparency and compliance. Our approach is underpinned by a strong governance framework, led by our Governance Director, and supported by our Board of Directors, who maintain full commitment to a culture of zero tolerance toward modern slavery.

Education and awareness are central to our strategy. We empower employees, suppliers, and stakeholders to recognise and report signs of exploitation through training, open communication channels, and access to resources. Our internal learning platforms, ISO 9001-certified Quality Management System, and SharePoint tools are used to escalate key messages and maintain ongoing engagement across the Group. We encourage all workers to speak up and feel confident in raising concerns, knowing they will be supported and heard.

Staffline's commitment to ethical business practices is embedded in our Environmental, Social, and Governance (ESG) strategy, which is not merely a compliance exercise but a core component of our corporate identity. Our ESG Committee, with deep insight into our Group and subsidiaries, ensures that our strategy remains aligned with our business goals and industry standards. Our annual [ESG Report](#) outlines our progress and future plans, including our unwavering commitment to addressing modern slavery and hidden labour exploitation.

We are proud of the scale and reach of our business, which enables us to collaborate with partners both within and beyond our industry. These partnerships help raise awareness and drive meaningful change across the UK. We actively participate in initiatives such as [Scotland Against Modern Slavery \(SAMS\)](#), and we welcome all opportunities to work with enforcement bodies, charities, and other organisations to protect workers and support survivors.

Staffline will continue to invest in the identification and prevention of modern slavery, using intelligence-led approaches and lessons learned from past cases to strengthen our processes. We remain fully committed to compliance, ethical standards, and continuous improvement. Our goal is not only to meet legal obligations but to lead by example in creating a responsible, transparent, and socially conscious organisation.

Approved by the Board of Directors of Staffline Group plc in November 2025.

Albert Ellis
Chief Executive Officer
Staffline Group PLC

Staffline Group Divisions

Staffline operates with a structured, division-based approach to provide specialised recruitment and workforce solutions.



Staffline Recruitment GB
<https://www.staffline.co.uk/>



Brightwork Staffline (part of Staffline Recruitment GB)
<https://www.brightwork.co.uk/>



Omega (part of Staffline Recruitment GB)
<https://www.omegaresource.co.uk/>



Staffline Recruitment Ireland
<https://stafflinerecruit.com/>



Datum RPO
<https://www.datumrpo.com/>

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