



Modern Slavery Act 2015 Compliance Statement 2021-2022

Company Business Model

Within the UK, Advantage Group is organised into two operating companies or business groups:

Advantage Resourcing UK also trading as Crone Corkill is a national recruitment consultancy specialised in the recruitment and placing of highly qualified candidates in a variety of business roles, including technical, IT, engineering, finance, accounting, legal and executive support.

Advantage xPO specialises in providing professional outsourcing services. Advantage xPO offers to clients a range of workforce solutions including Recruitment Process Outsourcing (RPO), Managed Service Provider or Program (MSP)(also known as Contingent Workforce Management), workforce consulting and procurement, project management, payroll, and functional outsourcing for corporate divisions. Advantage xPO provides integrated talent and workforce management services that allow companies to transform its business performance.

Company Policy

Advantage is fully committed to eliminating modern slavery, human trafficking, forced labour, child labour and similar human rights abuses and we have zero tolerance approach to modern slavery and human trafficking.

We protect a culture of mutual trust and value differences of opinion and cultural diversity. There are clear standards on employee's and human rights, among which, there is zero tolerance for harassment, discrimination and human rights violations.

Advantage recognises the key responsibility it has within the supply chain of skilled labour and professionals to ensure that all individuals sourced, procured or engaged are treated fairly, ethically and in compliance with legislative requirements.

Throughout its core businesses Advantages holds itself accountable for ensuring that it and its third party Suppliers are aware of the impact and requirements of the Modern Slavery Act 2015.

Advantage is a member of The Association of Professional Staffing Companies (APSCO) which further demonstrates our commitment to adhering to the highest industry standards.

Our Vision

Our vision, 'a world where people can follow their hearts' starts with respecting human rights. We follow our Code of Conduct and underlying policies in which these essential rights are safeguarded.

Sustainable Development Goals

We will pursue the following United Nations Sustainable Development Goals ('SDGs') that are associated with our five material matters, to contribute to global sustainability.

The SDGs that correspond to the critical issues identified by materiality analysis are as shown below. As can be seen from the focus themes, we consider human rights a crucial issue, recognising it as being at the root of all SDGs.



Our Five Material Matters

Our Five Material Matters are built around social responsibility and the sustainability of both our planet and its people. We as a company have a responsibility to contribute to a safe, fair and healthy planet by contributing to the environment and society through all our activities.

In order to realise our corporate mission of creating a prosperous society in which each individual can flourish, we have established the following five core themes for our sustainability activities.

1. Inspire New Ways of Working: What does work mean to us? How can we work better? We will continue to evolve new ways of working to find paths for individuals to achieve their aspirations. Maximising human talent is our core business.

2. Close the Opportunity Gap: We believe that the more people are free to pursue their passions, the better the future becomes. Closing the opportunity gap is a key factor for this. We have matched countless people and businesses in ways that have not been done before and will continue to do so. We want to be an innovative, accessible and attractive employer for all our talent – both our own staff and temporary workers. An employer that provides a platform for them to maximise their unique talent.

3. Celebrate Diversity and Inclusion: We celebrate diversity in nationality, race, religion, gender, age, disabilities, sexual orientation and gender identity, and more.

We respect and capitalise on each other's differences to promote creativity in the world. Our aim is to achieve a diverse composition of employees within every level of the organisation, focusing on aspects such as gender and age, as well as on people with an (occupational) limitation or people who are otherwise further removed from the job market.

4. Respect Human Rights: Our group global vision, 'a world where people can follow their hearts' starts with respecting human rights. We follow our Code of Conduct and underlying policies in which these essential rights are safeguarded.

5. Conserve the Environment: We all have a common responsibility for the global environment. We strive to reduce our negative impact on the environment by addressing climate change, resource preservation and biodiversity conservation. We aim to enlighten society with our environmentally conscious lifestyle.

Company Training

All Advantage directors, senior managers and employees are given training to raise awareness of individual and collective responsibilities under the Modern Slavery Act 2015.

The training is mandatory for all employees during the first 6 months of their employment.

We ensure that we are prepared to engage our Clients and third party Suppliers to achieve alignment in the procurement and supply chain to address respective responsibilities of the Modern Slavery Act 2015 in order to implement and maintain an effective and transparent process of compliance.

Our Policies

Advantage maintains the following policies, which are provided to our staff upon joining our business.

- **Code of Conduct**

The fundamental principle in our code of conduct policy is that all business conducted by members of Advantage must meet the highest moral and ethical standards as well as comply with the law. Advantage is committed to eliminating unethical behaviour and conflict of interest within our organisation and we encourage employees to disclose any such activities.

We provide and expect our employees to promote a harassment and discrimination-free workplace and require our suppliers and customers to do the same. A workplace where all People are treated with respect and dignity and are protected from any type of harassment or discrimination, including harassment or discrimination on the basis of race, ethnic or national origin, religion, age, gender, sexual orientation, marital status, disability or type of employment (limited/unlimited, temporary/fixed).

- **Diversity and equality policy**

The policy aims to eliminate discrimination in employment of new staff and through the policy we enforce our strong believes that the qualifications, merit and experience of an applicant should be the sole criteria when putting forward an applicant for employment or engagement.

- **Human rights policy**

The policy promotes sound ethical values and human rights principles to our staff.

- Employees should conduct themselves in accordance with highest ethical standards
- No discrimination is practiced within our organisation

- Employment is freely chosen. No forced, bonded or involuntary prison labour is permitted;
- Our employees are able to work in an environment free of physical, psychological or verbal abuse, the threat of abuse and sexual or other harassment and accordingly, these are prohibited.
- Advantage prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking.
- Employees shall be paid wages and benefits for a standard working week that meet national minimum requirements.
- Employees shall be informed of their working conditions in written and understandable format with respect to their wages and circumstances of each payment.
- Prohibition of Child Labour
- **Whistleblowing policy**
The policy encourages staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be protected wherever possible. This including instances of Modern Slavery or Human Trafficking.

Compliance Process for Slavery and Human Trafficking

Regardless of whether sourced, procured or engaged directly or indirectly via third party Suppliers, Advantage ensures a thorough process of compliance with respect to the following minimum requirements in respect of all engagements.

We commit to the following:

- Uphold the highest standards of human and labour rights as detailed in the United Nations' Universal Declaration of Human Rights (UNUDHR) and the International Labour Organisation (ILO) fundamental conventions on labour rights;
- Obtain consent from all Workers to represent them as agent to Clients;
- Engage with Workers who have the legal right to work in the UK and we check this following the guidance set out by the Home Office;
- Operate processes in compliance with the Agency Workers Regulations to ensure that our Workers receive equal treatment and fair remuneration;
- Ensure transparency of rates and charges payable to Workers by providing a written contract to all Workers outlining the terms and conditions of their engagement, their pay and job requirements;
- Ensure our Workers are engaged in a legally compliant working environment;
- Not accept child labour and any practice that inhibits the development of children;
- Our Workers have the unconditional right to refuse to provide services to Clients;
- We operate Scheduled Compliance Audits on all Worker to ensure compliance with legal and client requirements;

Our Supply Chain

As a managed service provider, Advantage xPO works with a number of UK based recruitment companies who form part of our supply chain. The role of our supplying agencies is introduction of workers to our end clients under the management of Advantage xPO.

Our approach to supply chain management is based on the principles of fairness, transparency and compliance. All new suppliers are subject to thorough checks, including financial and compliance

checks, to ensure that they are financially sound and ethical businesses, who operate in line with legal and best practice requirements.

We expect both ourselves and our supplier partners to comply with all applicable laws and regulations which include providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically and using environmentally responsible practices where practicable.

To underline the importance of these principles to our company, we have documented them in our Code of Conduct to emphasise what we believe are the pillars on which our company is built on. In turn these pillars are reflected and flowed down into our Supplier Code as a demonstration of our commitment to you and our contingent labour workforce.

Our Supplier Code outlines the basic principles of how we intend to operate our business, in line with our corporate values of Collaborative; Results Driven; Respect; Continuous Improvement; Customer Focused and Integrity & Ethics. It also sets the tone as to the behaviours and practices we expect of our supplier partners.

We operate scheduled supply chain audits ensuring that any workers sourced by suppliers receive a high level of service in line with legal and contractual requirements.

Compliance Statement Summary

As an organisation, we fully accept our responsibility as a key entity within the procurement and supply chain of skilled labour and professionals. We review our policies and procedures regularly to ensure their effectiveness and we aim to increase our positive impact year on year.

We endeavour to achieve the intended outcomes of the Modern Slavery Act 2015 through monitoring the conduct and processes of our business groups in addition to those of our third party Suppliers.

During the course of 2021-2022, Advantage will continue our efforts in the following areas:

- Continue to increase our efforts in focusing on Sustainability and Ethics, including creating a safe work environment and treating everyone with respect
- Continue to deliver mandatory training to all staff and raising our staff awareness about Modern Slavery and prevention of child labour, forced labour and human trafficking
- Collaborate with our clients in this area
- Ensure all suppliers are signed up to our Supplier Code of Conduct
- Carry out regular audits on our supply chain
- Identify suppliers in high risk areas and ensure they are completing a Modern Slavery Checklist form for each worker they supply

As part of our efforts in this area, we publish a modern slavery statement on an annual basis.

This statement has been last reviewed and approved on 27/04/2021.

by Joanna Oakley

UK Operations Director

