COMPANY POLICY DOCUMENT

Anti-Slavery and Human Trafficking Policy

Our zero-tolerance approach to slavery, servitude, forced or compulsory labour, debt bondage and human trafficking across our business and labour supply chains.

Policy owner	Compliance Director, People Group Services Limited
Approved by	The Board of Directors
Version	2026.8 (supersedes the version dated 1 May 2026)
Effective date	21 August 2026
Next scheduled review	21 August 2027, with an interim review on Royal Assent of the Immigration and Asylum Bill
Applies to	All directors, officers, employees, workers, contractors, suppliers and third parties acting for or on behalf of the Company
Classification	Public — published on the Company policy portal

Legal and regulatory framework

This policy is made pursuant to the **Modern Slavery Act 2015** and reflects the Home Office statutory guidance *Transparency in supply chains: a practical guide*, substantively refreshed in March 2025.

Enforcement: the **Fair Work Agency** was established on 7 April 2026 under Part 5 of the Employment Rights Act 2025 and has taken over the functions of the Gangmasters and Labour Abuse Authority and the Employment Agency Standards Inspectorate, including gangmaster licensing and labour exploitation enforcement.

Labour supply chain: PAYE joint and several liability for umbrella company arrangements took effect on **6 April 2026** under Chapter 11 of Part 2 of the Income Tax (Earnings and Pensions) Act 2003, with equivalent National Insurance provisions. Statutory regulation of umbrella companies is expected to follow from 2027.

Also relevant: Conduct of Employment Agencies and Employment Businesses Regulations 2003; Gangmasters (Licensing) Act 2004; Immigration Act 2016; National Minimum Wage Act 1998; Employment Rights Act 1996 and 2025; Public Interest Disclosure Act 1998; Bribery Act 2010.

Under review: the Immigration and Asylum Bill, introduced on 30 June 2026, would materially expand modern slavery reporting obligations. See section 15.

What has changed in this version

The enforcement landscape for labour exploitation changed substantially in April 2026, and further change to modern slavery reporting is currently before Parliament. This version reflects both.

Area	What is new
Fair Work Agency	The Gangmasters and Labour Abuse Authority and the Employment Agency Standards Inspectorate ceased to operate as separate bodies on 7 April 2026. The Fair Work Agency is now the single enforcement body, with expanded investigatory powers, the ability to bring tribunal proceedings on a worker's behalf and to recover arrears going back six years. See sections 3 and 12.
Joint and several liability	From 6 April 2026 an agency, or in some cases an end client, can be liable for PAYE and Class 1 National Insurance that an umbrella company fails to pay. Compliance evidence is now a commercial requirement across the supply chain, not just a regulatory one. See section 9.
Statutory guidance	Aligned to the March 2025 refresh of the Home Office statutory guidance, which places far greater weight on demonstrating the **effectiveness** of the steps taken, rather than simply listing them. See section 16.
Reporting reform	The Immigration and Asylum Bill would prescribe mandatory content for modern slavery statements, require a signed declaration of accuracy, impose a six-month publication deadline and introduce financial penalties. See section 15.
Ethical recruitment	New section adopting the Employer Pays Principle and setting out our position on worker-paid fees, document retention and freedom of movement. See section 10.
Indicators and response	New practical sections on recognising indicators of modern slavery and on what to do when a case is suspected, including National Referral Mechanism routes. See sections 11 and 13.
Effectiveness measures	New section setting out the measures against which we assess whether this policy is working. See section 16.

1. Policy statement

People Group Services Limited (“the Company”, “we”, “our”) is committed to conducting business ethically, with integrity and transparency, and to implementing effective systems and controls to safeguard against modern slavery and human trafficking taking place anywhere in our business operations or supply chains.

We have a zero-tolerance approach to slavery, servitude, forced or compulsory labour, debt bondage, child labour and human trafficking. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

This policy is made pursuant to the Modern Slavery Act 2015 and reflects our commitment to compliance with UK law and to good corporate governance. It is approved by the Board of Directors and is mandatory.

We recognise that we operate in a sector where the risk is real. Temporary labour supply, layered subcontracting and low-margin work are recognised risk factors for labour exploitation, and the sectors we serve include several of the highest-risk in the UK economy. We do not treat this policy as a formality.

2. Scope

This policy applies to:

- all directors, officers and employees of People Group Services Limited and its group companies;

- temporary workers and contractors engaged through our umbrella, PEO sole employment and joint employment models;
- agency workers, candidates and subcontractors in our supply chains;
- consultants, professional advisers and service providers;
- suppliers, technology providers and supply chain partners;
- recruitment agencies, hirers and Managed Service Providers with whom we contract;
- any other third party acting for or on behalf of the Company.

Compliance with this policy, and with anti-slavery law generally, is a condition of doing business with us. Where a third party will not accept that condition, we do not contract with them.

3. Definitions and legal framework

Term	Meaning
Slavery	The exercise over a person of powers attaching to the right of ownership.
Servitude	An obligation to provide services imposed by coercion, linked to a loss of personal freedom.
Forced or compulsory labour	Work or service exacted from a person under the menace of a penalty and for which they have not offered themselves voluntarily.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation, whether or not they consented to the travel.
Debt bondage	Requiring a person to work to repay a debt, where the debt is manipulated, is not properly accounted for, or where the value of the work is not reasonably applied to it.
Child labour	Employment of a person below the applicable minimum working age, or in work that is hazardous, interferes with education or is otherwise unlawful for their age.

Enforcement

The **Fair Work Agency** was established on 7 April 2026 as an executive agency of the Department for Business and Trade under Part 5 of the Employment Rights Act 2025. It has absorbed the functions of the Gangmasters and Labour Abuse Authority and the Employment Agency Standards Inspectorate, with National Minimum Wage enforcement transferring on a phased basis. Its powers include entering and inspecting premises, requiring the production of records, issuing notices of underpayment with penalties, bringing employment tribunal proceedings on a worker's behalf, and recovering arrears going back up to six years. Gangmaster licensing and labour abuse prevention functions continue under the Agency.

We cooperate fully with the Fair Work Agency, HMRC, the police and any other competent authority, and we do not obstruct or delay a lawful investigation.

4. Our business and supply chain

People Group Services Limited operates in the professional employment, payroll, joint employment and workforce compliance sector across the United Kingdom. Our services include:

- PAYE payroll processing and umbrella employment;
- PEO sole and joint employment models;
- Managed Service Provision (MSP) support;

- compliance verification services;
- workforce engagement and technology solutions.

Our supply chain includes:

- recruitment agencies and employment businesses;
- technology, software and hosting providers;
- identity verification and screening providers;
- professional advisers, including legal, audit and insurance;
- regulated financial institutions and payment providers;
- office, facilities, cleaning and security suppliers.

Given the sectors in which we operate — including education, healthcare, social care, logistics, construction and professional services — we recognise an inherent risk in extended labour supply chains and apply enhanced due diligence accordingly.

5. Governance and accountability

- the **Board of Directors** holds ultimate accountability for this policy and approves it and the Company's annual modern slavery statement;
- a **named Director** holds day-to-day responsibility for modern slavery risk, supported by the Compliance function;
- modern slavery risk is a standing item on the compliance agenda, and material concerns are escalated to the Board without delay;
- responsibility for supplier due diligence sits with the function that owns the relationship, with oversight from Compliance;
- every manager is responsible for ensuring their team understands this policy and knows how to raise a concern.

6. Our commitments

We commit to:

- ensuring no forced, bonded or involuntary prison labour is used in our operations, and not knowingly in our supply chain;
- ensuring no worker is required to lodge deposits, pay recruitment fees, or surrender identity papers as a condition of employment or engagement;
- ensuring all workers are paid lawfully and on time, in accordance with National Minimum Wage and National Living Wage regulations, with transparent and lawful deductions;
- ensuring freedom of movement, and the right to terminate employment in accordance with contractual and statutory provisions, without penalty;
- ensuring working hours comply with UK employment legislation, including the Working Time Regulations 1998, and that opt-outs are genuinely voluntary and revocable;
- ensuring no child labour is used within our business, or knowingly within our supply chain;
- ensuring workers are treated with dignity and respect, free from harassment, intimidation and discrimination;
- ensuring workers can raise concerns confidentially and without fear of retaliation;

- acting promptly and proportionately where a concern is raised, prioritising the safety and wellbeing of the individual over commercial or reputational considerations.

7. Risk assessment

We assess modern slavery risk on a risk-based cycle, and whenever we enter a new sector, geography or supply arrangement. The risk areas we consider most material are set out below.

Risk area	Why it matters	Primary mitigation
Labour-intensive sectors	Healthcare, social care, education supply, logistics, construction, cleaning and hospitality carry recognised exploitation risk.	Enhanced onboarding checks; sector-specific worker communications; hirer engagement.
Multi-layer subcontracting	Visibility falls sharply below the first tier, and responsibility becomes diffuse.	Contractual flow-down; mapping beyond tier one for higher-risk suppliers; audit rights.
Non-compliant intermediaries	Mini-umbrella fraud, disguised remuneration schemes and unlicensed labour providers are directly linked to worker detriment.	Provider vetting; accreditation checks; refusal to work with unverified intermediaries.
Debt and deduction manipulation	Unexplained deductions, accommodation or transport charges and advance repayment can create debt bondage.	Transparent Pay and Deductions Policy; payslip validation; assignment rate integrity checks.
Bank account irregularities	Third-party control of a worker's pay is one of the strongest single indicators of exploitation.	Bank Account Change and Verification Policy; duplicate account detection and investigation.
Vulnerable workers	Workers with limited English, insecure immigration status or recent arrival are at higher risk.	Plain-English communications; direct contact with the worker; independent reporting routes.
Overseas support providers	Offshore technology and support functions may sit in jurisdictions with weaker labour protection.	Supplier due diligence; contractual anti-slavery clauses; periodic review.

8. Due diligence procedures

To identify and mitigate risk, the Company:

- conducts right to work verification in accordance with Home Office guidance, using manual checks, the Home Office online checking service, eVisa and share code checks, or a certified identity service provider, and repeats checks where a time-limited permission expires;
- verifies that each worker's bank account is their own, and investigates duplicate or third-party accounts before any payment is released;
- contacts workers directly at onboarding, so that the relationship is not mediated solely through a third party;
- validates assignment rates, deductions and payslips against the Key Information Document issued to the worker;
- performs supplier onboarding due diligence and compliance assessments, in line with our Supply Chain Due Diligence Policy;
- engages only with regulated financial institutions;

- maintains accreditation and submits to external compliance audit where applicable;
- conducts risk-based reviews of labour supply chains, extending beyond the first tier where risk warrants it;
- includes contractual provisions in supplier and client agreements requiring compliance with anti-slavery law, immediate notification of concerns, and audit rights;
- records the due diligence carried out, so that it can be evidenced to a client, an auditor or the Fair Work Agency.

Supplier requirements

Suppliers and supply chain partners must confirm that:

- they comply with the Modern Slavery Act 2015 and all applicable labour law;
- they maintain their own anti-slavery policy and, where in scope, publish a modern slavery statement;
- they do not charge workers recruitment fees or related costs;
- they hold any licence required for their activity, including a Fair Work Agency (formerly GLAA) licence in the licensed sectors;
- they will notify us promptly of any actual or suspected instance of modern slavery in their operations or supply chain;
- they permit audit and information requests where appropriate, and will pass equivalent obligations down to their own suppliers.

9. Labour supply chain transparency and joint and several liability

> **What changed on 6 April 2026**
>
> Where a worker is supplied through an umbrella company, HMRC can recover unpaid PAYE income tax and Class 1 National Insurance contributions from another party in the labour supply chain on a joint and several basis — in most cases the recruitment agency that contracts with the end client, or the end client itself where there is no UK agency in the chain.
>
> The umbrella company remains the employer and retains the primary duty to operate PAYE. What has changed is who else can be pursued, and HMRC does not have to pursue the umbrella first.
>
> Liability arises irrespective of fault. This makes the identity and conduct of every intermediary in the chain a matter of direct financial consequence for the parties above it.

We treat this as a modern slavery control as much as a tax control. The intermediaries that fail to remit PAYE are, very often, the same intermediaries that underpay workers, manipulate deductions and obscure who is really being paid.

Accordingly, we:

- operate transparent PAYE payroll systems, with full Real Time Information reporting to HMRC;
- provide agencies, hirers and MSPs with the compliance assurance they need to discharge their own due diligence, proportionately and in line with our Data Protection and Privacy Policy;
- map the labour supply chain for each engagement and record the parties in it;
- decline to participate in supply chains where we cannot identify the parties, or where an intermediary will not evidence its compliance;
- escalate and, where necessary, exit arrangements that show signs of disguised remuneration, mini-umbrella structures or unexplained layering.

Statutory regulation of umbrella companies is expected from 2027 under the Employment Rights Act 2025, with the Fair Work Agency expected to hold the remit. We are preparing on that basis.

10. Ethical recruitment

We adopt the **Employer Pays Principle**: no worker should pay for a job, and the costs of recruitment should be borne by the employer, not the worker.

- we do not charge, and do not permit any party acting for us to charge, any fee to a worker for finding or seeking to find them work, in line with the Conduct of Employment Agencies and Employment Businesses Regulations 2003;
- we do not require deposits, bonds or the repayment of recruitment costs;
- we do not retain original identity documents, passports or immigration documents. Copies are taken only as required for right to work purposes and originals are returned immediately;
- we do not make the provision of work conditional on the use of a particular accommodation, transport or service provider;
- workers are free to terminate their employment in accordance with their contract, without penalty, and are free to work for others where their contract permits;
- contracts, Key Information Documents and pay information are provided in clear language before work begins;
- where a worker has limited English, we take reasonable steps to ensure they understand their pay, deductions and rights.

11. Recognising the indicators

Modern slavery is rarely reported by the victim. It is far more often noticed by someone who spots that something does not add up. Staff should be alert to:

Category	What to look for
Payment and banking	Multiple workers sharing one bank account; frequent changes of account details; a third party requesting a change; wages paid to someone other than the worker; unexplained deductions.
Control and communication	A third party speaking for the worker, or always present; reluctance to speak alone; the same contact details, address or emergency contact used for many workers.
Documents	Identity documents held by someone else; workers unable to produce their own documents; identical or templated documents across several applicants.
Working conditions	Excessive hours; no rest breaks; workers appearing at the assignment before or after their recorded shift; transport to and from work controlled by a third party.
Presentation and behaviour	Signs of physical or psychological distress; fear of authority; unwillingness to raise a grievance; inconsistent accounts of their circumstances.
Recruitment	Workers reporting that they paid to get the job; debts owed to a recruiter; terms different from those they were promised.

No single indicator proves exploitation, and several may have an innocent explanation. The duty is to raise the concern, not to reach a conclusion.

12. Reporting concerns

All employees, workers, contractors, suppliers and stakeholders are encouraged and expected to report concerns about modern slavery or unethical labour practices. Reports may be made:

- directly to a Company Director or to the Compliance function;
- through our internal whistleblowing procedure, set out in our Whistleblowing Policy;
- by email to compliance@peoplegroupservices.com;
- confidentially, and where preferred, anonymously.

Reports made in good faith are protected disclosures under the Public Interest Disclosure Act 1998. **No one will suffer detriment, dismissal, or any adverse treatment for raising a concern in good faith**, even if the concern turns out to be mistaken. Retaliation against a person who raises a concern is itself a disciplinary matter.

> **External reporting routes**
>
> **Immediate danger:** call **999**.
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> **Modern Slavery and Exploitation Helpline:** 08000 121 700, 24 hours a day.
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> **Fair Work Agency:** for labour exploitation, employment agency conduct and gangmaster licensing concerns (functions formerly held by the GLAA and the Employment Agency Standards Inspectorate).
>
> **Crimestoppers:** 0800 555 111, anonymously.
>
> Nothing in this policy prevents anyone from reporting directly to the police or to a regulator, and no internal process needs to be exhausted first.

13. Responding to a suspected case

Where modern slavery is suspected, the safety of the individual comes first. Anyone who suspects a case must escalate immediately to a Director or the Compliance function, and must not attempt to handle it alone.

1. **Do not confront the suspected exploiter**, and do not alert them. Doing so can put the worker at serious risk and can destroy evidence.
2. **Do not interrogate the worker.** Record what you observed factually and contemporaneously.
3. **Escalate immediately** to a Director or Compliance. If there is a risk of immediate harm, call 999 first.
4. **Preserve the worker's income and engagement** wherever it is safe to do so. Suspending pay or terminating an assignment can deepen the harm and remove the only stable element in the worker's situation.
5. **Secure the pay route.** Where a bank account is suspected to be under third-party control, payments are held and the position is verified directly with the worker.
6. **Refer to the National Referral Mechanism.** The Company is not a designated First Responder organisation, so referrals are made through the police, a local authority or an authorised charity. An adult must consent to a referral; a child does not, and a suspected child case is referred to the police and to children's social care without delay.
7. **Support the worker** to access independent advice and support, and do not require them to remain in the arrangement while matters are investigated.
8. **Record and review.** Every case is logged, reported to the Board, and reviewed for what it tells us about our controls.

14. Training and awareness

Training is provided on induction and refreshed at least annually, with additional role-based content for higher-exposure roles. It covers:

- the indicators of forced labour, trafficking and debt bondage;
- ethical recruitment practices and the Employer Pays Principle;
- supply chain vigilance and supplier due diligence;
- escalation procedures and the protections available to those who raise concerns;
- the practical steps in section 13, including what not to do.

Onboarding, payroll, compliance and account management teams receive enhanced training, because they are the roles most likely to see the first indicator. Senior management retains responsibility for ensuring appropriate internal understanding of risk, and training completion is monitored and reported to the Board.

15. Modern slavery statement and transparency reporting

Section 54 of the Modern Slavery Act 2015 requires commercial organisations carrying on business in the UK with a total turnover of £36 million or more to publish an annual slavery and human trafficking statement. The statement must be approved by the board and signed by a director, and published on the organisation's website with a link in a prominent place on the homepage.

Where the Company is in scope, it publishes a statement for each financial year. Where it is not, it publishes one voluntarily, because our clients, agency partners and accreditation bodies reasonably expect it and because the discipline of preparing it is valuable in itself. Our current statement is published on our policy portal.

Anticipated reform

The Immigration and Asylum Bill, introduced on 30 June 2026 and given a second reading on 13 July 2026, would materially change section 54. The Public Bill Committee began detailed scrutiny in September 2026. None of the following is law yet, and the provisions would be commenced separately by regulations, but we are preparing on this basis:

Proposed change	What it would mean
Mandatory content	Statements would have to cover structure, operations and supply chains; steps taken to identify and mitigate risk; policies, due diligence and training; and the effectiveness of the steps taken — rather than these being voluntary.
Declaration of accuracy	The signatory would have to declare that the statement is accurate to the best of their knowledge and belief, in addition to existing board approval.
Publication deadline	Publication would be required as soon as reasonably practicable after the financial year end and in any event within six months.
Central submission	The Secretary of State would gain power to require electronic submission of statements, or links to them, through a government-coordinated mechanism.
Financial penalties	Penalties for non-compliance without reasonable excuse, capped at the higher of 1% of total turnover or £1 million.
Public authorities	Reporting obligations would extend to public authorities meeting a budget threshold — relevant to our public sector clients.

We also monitor the Independent Anti-Slavery Commissioner's proposed model legislative framework, published in December 2025, which recommends going considerably further, including prohibiting forced labour products and replacing section 54 with broader human rights reporting and disclosure obligations.

16. Measuring effectiveness

The March 2025 statutory guidance places substantially more weight on whether an organisation's actions actually work than on whether it has policies at all. We assess effectiveness against:

- the proportion of workers contacted directly at onboarding, independently of any intermediary;
- the number of duplicate or third-party bank account flags raised, investigated and resolved, and the time taken;
- the proportion of suppliers and intermediaries onboarded with completed due diligence, and the number declined or exited on compliance grounds;
- training completion rates and the results of knowledge checks, by role;
- the number of concerns raised, the routes used, and outcomes — a total of zero is treated as a warning sign about reporting confidence, not as reassurance;
- the results of external accreditation assessments and client audits;
- the number of labour supply chains mapped beyond the first tier for higher-risk engagements;
- payslip and assignment rate validation exception rates.

These measures are reported to the Board at least annually and inform the content of our modern slavery statement.

17. Breach of policy

- any employee found to be in breach of this policy may face disciplinary action, up to and including summary dismissal for gross misconduct;
- any worker or contractor found to be in breach may have their engagement terminated;
- any supplier or partner found to be in breach may have their contract terminated with immediate effect, and may be reported to the relevant authorities;

- where the breach may involve a criminal offence, we report it to the police or the Fair Work Agency;
- failing to raise a concern that a reasonable person would have raised, or obstructing an investigation, is itself a breach of this policy.

We recognise that terminating a supply relationship is not always the right response for the worker. Where exiting a supplier would leave affected workers worse off, we consider remediation and supported improvement first, and we document the reasoning.

18. Review

This policy is reviewed at least annually by the Board, and sooner where there is a material change in legislation, regulatory guidance or our operations. An interim review will be carried out on Royal Assent of the Immigration and Asylum Bill, and again when statutory regulation of umbrella companies commences. The current version is always published on our policy portal.

19. Declaration

This Policy is approved by the Board of Directors of **People Group Services Limited**, Company Number 11570329.

> **Version:** 2026.8 | **Effective:** 21 August 2026 | **Supersedes:** version dated 1 May 2026
>
> **Next scheduled review:** 21 August 2027

Signed for and on behalf of the Board of Directors

Date
21 August 2026