

Cpl's Modern Slavery and Human Trafficking Policy

Purpose

To set out the Company's policies in relation to Slavery and Human Trafficking.

Summary Statement

Modern slavery and human trafficking is an international problem, representing a widespread violation of fundamental human rights whereby individuals are forced to work illegally against their will across many different sectors such as (but not limited to) agriculture, hospitality, construction, retail and manufacturing. The Criminal Law (Human Trafficking) Act 2008 and the Criminal Law (Human Trafficking)(Amendment) Act 2013 are the primary legislation that deal with human trafficking in Ireland, potentially imposing penalties of up to life imprisonment and unlimited fines on those convicted of trafficking people for labour or sexual exploitation, removing a person's organs, forced criminality or forced begging.

Through our actions and commercial practices, our policies (including but not limited to) the Ethical Trading Policy, Speaking Up Policy, Anti-Bribery & Corruption Policy and contractual arrangements with third parties, Cpl is committed to combatting slavery and human trafficking.

Organisational Structure

Cpl is an Irish global recruitment and managed services agency. The Cpl Group comprises of 23 brands with expertise across a number of sectors including healthcare, banking, accounting and finance, insurance, construction, industrial, hospitality, and others. We employ in excess of 13,000 staff worldwide. We have 48 office locations across Ireland, the United Kingdom and Central Eastern Europe, together with newly established offices in Boston and Munich. Further details on the structure of Cpl are available on our website www.cpl.com

Policy Statement

Cpl has a zero-tolerance approach to modern slavery and human trafficking. In accordance with our Sustainability policy, Cpl believes that businesses have the same social and ethical responsibilities as individuals. Wherever we do business we comply with existing laws and regulations and we will need to ensure that our suppliers also operate in the same manner. We must establish shared values, accountability, ethics and a culture of trust and openness throughout our value chain. We will ensure our partners and suppliers operate in line with our values.

Our commitments are based on the general principles contained in the Universal Declaration of Human Rights, the International Covenant on Civil & Political Rights, the International Covenant on Economic, Social & Cultural Rights, the Eight Fundamental ILO Conventions and other relevant international human rights and labour standards.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

ACTIVE PREVENTION

In order to prevent the occurrence of incidents of modern slavery within our own business and throughout our supply chain we shall:

- identify, monitor and assess those areas of our business and supply chain most at risk from modern slavery and implement initiatives to enhance risk management effectiveness;
- engage with our contractors, suppliers and other business partners at the outset of our business relationship to convey to them this policy and to require them to comply with it at all times
- incorporate anti-slavery and human trafficking obligations as part of our procurement agreements and contractual processes and, where appropriate, carry out an audit and/or investigation of the activities of those contractors, suppliers or business partners deemed high risk
- provide training to relevant employees to facilitate achievement of the objectives of this policy

ROLES AND RESPONSIBILITIES

Cpl management has overall responsibility for this policy. The key roles and responsibilities in relation to this policy are as follows:

Board

- Determination of corporate policy in relation to the UK Modern Slavery Act, The Criminal Law (Human Trafficking) Act 2008 and the Criminal Law (Human Trafficking) (Amendment) Act 2013
- supporting the ongoing implementation of this policy which may include regular review of the internal control framework and controls identified as being needed to drive compliance with this policy
- approving the annual statement

Group HR

- day-to-day operational responsibility for the implementation of this policy
- allocating sufficient and appropriate resources to implement and ensure compliance with this policy including ongoing training and awareness
- ensuring that all managers and other staff who may deal with concerns or investigations under this policy receive appropriate training
- operating and maintaining internal control systems to prevent the occurrence of modern slavery in our supply chains

Employees (and contractors and/or other third parties working for us or under our control)

- Conducting business in a manner such that the opportunity for any incidence of modern slavery is prevented
- Avoiding any activity that might lead to, or suggest, a breach
- Reporting (see below)

OBLIGATION TO REPORT SUSPICIONS/KNOWLEDGE OF SLAVERY /HUMAN TRAFFICKING

All employees of Cpl are obliged to report knowledge or suspicion of slavery or human trafficking as soon as they become aware of it. Individual's who suspect or know that slavery/human trafficking has occurred or is occurring must immediately report this to their line manager and to HR without delay. The Whistleblowing/Protected Disclosure policy provides further guidance and confirmation that employees who alert us to slavery or human trafficking may do so without fear of retaliation.

BREACHES OF THIS POLICY

Any Cpl employee involved in a wrongdoing in breach of this policy may face disciplinary consequences in accordance with the Cpl Disciplinary Policy and Procedure, including potential disciplinary sanctions up to and including dismissal.

Changes to this policy

Cpl reserves the right to amend this policy and will give 1 month's notice of any changes.

For any questions on this policy, please contact Human Resources.

Group HR

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