

Modern Slavery Statement

for the financial year 1 August 2023 – 31 July 2024

This statement is made on behalf of all companies and brands within the Gattaca Group that were applicable for the financial year end 31 July 2024 which includes Gattaca plc, Matchtech Group (UK) Ltd, Networkers International (UK) Ltd, Resourcing Solutions Ltd, Barclay Meade Ltd, Alderwood Education Ltd, Gattaca Projects Ltd, Cappo 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, Cappo Inc, Connectus Technology Ltd and Comms Resources 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 2024.

This statement was approved by the Board of Directors on 11 December 2024.

Introduction

Our values of Trust, Professional, Ambition and Fun underpin everything we do. They reflect our purpose and strategy, and shape who we are as an organisation.

These ways of working directly relate to the importance we place on our responsibility in working towards combatting 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 400 people work for Gattaca across an international network of offices spanning three continents.

During the financial year up to 31 July 2024, the Gattaca Group (Group) consists of a number of specialist recruitment brands including:

Matchtech; a leading engineering and technology recruitment specialist;
Barclay Meade; specialising in professional staffing across commercial management, finance & accountancy, HR, procurement, sales & marketing and supply chain management;
Gattaca Solutions; creating managed service programmes, recruitment process outsourcing and total workforce solutions; 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 modern 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. Any concerns raised are initially reviewed by a defined cohort of employees across the People, Compliance and Legal teams who will define the best course of action to effectively address the concern.

Our Supplier Code of Conduct sets out our ethical standpoints, and inherently what we expect from our suppliers too, both in principal and in spirit. Our expectation is for this to cascade through our suppliers' supply chains as well to maximise the best opportunity of ethical reach.

Our Sustainability Report is a culmination of all our efforts around our ESG agenda which includes operating with fair and ethical conduct.

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 modern slavery and human trafficking in our business and our supply chain. The Group, primarily through or with oversight from the Executive and subject matter experts within the Group, 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 modern 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 UK based supply received into the business, we have a Supplier Onboarding Process, whereby suppliers receive our Supplier Code of Conduct which they are expected to adhere to. This involves a commitment to acting ethically and with integrity at all times, and ensuring effective controls are in place to prevent modern slavery or human trafficking from taking place both in their business and within their supply chains. Our international offices are able to utilise the structure and intent of this process to manage their procurement locally.

We categorise our UK suppliers according to the nature and volume of their service, and tailor due diligence and compliance processes accordingly. We operate an annual review process of relevant compliance documentation, 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.

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 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 the PLC Board and the Audit Committee. This reporting will include any instances of modern slavery or human trafficking identified within our supply chain, breaches of our controls in place to help manage the modern slavery risk and whistleblowing notifications made by employees of a modern slavery or human trafficking

nature. (The reporting of any whistleblowing notifications acknowledges any anonymity and/or confidentiality required and may therefore only include volume of instances).

Leaders around the Group are also kept informed of any potential red flag areas within their specific areas of the business, allowing them to promptly take actions necessary.

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. They sit this training once every 2 years to keep knowledge and understanding up to date, and this starts within their first few weeks of employment with us.

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 anti modern slavery training to ensure our people are aware of the warning signs;
- real time review and regular analysis reports to our Speak Up facility;
- due diligence screening of third parties;
- ongoing auditing of payroll management service providers;
- maintaining our Gangmaster and Labour Abuse Authority license and RISQS membership; 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:

- implemented new contractor onboarding software which places an appropriate RTW check at the start of the journey and gives additional control over verifying individuals throughout the journey;
- created a supplier Code of Conduct which sets out ethical standpoint and our expectations of them;
- improved the governance of our suppliers;

- further improved contractor engagement strategies to maintain frequent contact with our contractors;
- improved our internal anti modern slavery training; and
- made our internal Code of Professional Conduct a mandated read every 2 years.

Gattaca is committed to continuous improvements of the controls that we have in place. Our current and upcoming focuses in preventing modern slavery and human trafficking are:

- continuing to monitor, clarify and enhance our processes for engaging with clients, umbrellas, payroll management companies and placing contractors in risky and non-risky areas, in order to protect workers;
- improve our internal Group modern slavery policy;
- improve visibility and contractors' method to notify us of health & safety concerns; and
- continuing our programme of improved contractor engagement strategies which will include opportunities to spot modern slavery and human trafficking red flags.

A handwritten signature in black ink that reads "Matt Wragg". The signature is fluid and cursive, with "Matt" on the top line and "Wragg" on the bottom line.

Matt Wragg - Chief Executive Officer - Gattaca plc

Date: 11 December 2024