

Ethical Supply Chain Policy

1. Policy Statement

- 1.1. This policy outlines Pro-Force's commitment to ensuring our supply chain, from recruitment through to assignment, is free from human trafficking, forced labour and other human rights abuses. We work closely with all business within our supply chain to conduct adequate due diligence checks to ensure their standards meet and match our high ethical requirements.
- 1.2. In order to mitigate risks to our business through unethical supply chain practices, it is our practice to not outsource work or engage with other suppliers (for example, overseas recruitment agencies), in order to ensure that we have full control over operations and can ensure standards are adhered to.
- 1.3. However, we do engage with external providers in terms of our service provision, where we are placing workers with clients to perform work assignments. It is essential that all our hiring clients meet and adhere to regulatory, legislative and ethical standards to protect the health, safety and welfare of our workforce at all times.

2. Scope of the policy

- 2.1. This policy is applicable to all Pro-Force branches, sites and locations across the UK, any Company that falls into the Pro-Force Group, and to all staff members including directors, senior managers, managers, officers, employees and volunteers (collectively referred to as staff in this policy).
- 2.2. This policy does not form part of the contract of employment for employees, and as such, Pro-Force reserves the right to amend the policy at any time.

3. Responsibility for implementation of the policy

- 3.1. The Managing Director and the Senior Management Team have overall responsibility for the implementation of this policy.
- 3.2. The Compliance department is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risk to operations.
- 3.3. Line managers and supervisors are required to familiarise themselves with, and understand this policy, its operation, and any related procedures. Compliance will provide training documentation and guidance on the provisions of this policy, as is relevant to their responsibilities.
- 3.4. Questions related to the use, understanding or direction of this policy should be directed to the Compliance department.

4. Pro-Force's supply chain

- 4.1. As is any labour provider, our supply chain is diverse. In order to ensure the proper performance of our services in line with our ethical standards, we must be aware of the risks to the business through that supply chain.
- 4.2. Key elements of our supply chain may include:
 - 2nd tier labour providers, such as local providers via master vendor agreements, or overseas providers (although our core business model is not to engage the services of such providers, operational requirements or client requests may demand it, and as such, we must ensure we are prepared)
 - Clients and labour users, where we place our workers
 - Other suppliers such as IT or systems suppliers, or equipment suppliers
- 4.3. It is crucial to the ongoing success of our business, and the health, safety and wellbeing of all our staff and workforce, that all suppliers adhere to, and actively demonstrate their commitment to, our ethical standards.

5. Requirements of our suppliers

- 5.1. Pro-Force requires all suppliers, be that 2nd tier agents, labour users or any other business involved in the performance of our services or operations, to actively demonstrate positive business practices in all areas, including:
 - Demonstrate positive practices to mitigate and eliminate the risks posed by modern slavery, forced labour and other forms of exploitation
 - Demonstrate rigorous health & safety standards in line with UK legislation (and any other countries as may be applicable)
 - Demonstrate responsible environmental performance in line with UK legislation and regulatory standards
 - Not to discriminate on any basis in accordance with the provisions of the Equality Act 2010 and any other related legislation
 - Permit worker's freedom of association and collective bargaining

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- To adhere to all requirements regarding the National Minimum and Living Wage (and other benchmark wage guidance, where applicable)
- To adopt the principles of the “Employer Pays” principle and not to charge workers any form of work finding fee in any circumstances.

5.2. Pro-Force requires all suppliers to be aware of our requirements, and take it upon themselves to be aware of and prepared to demonstrate adherence to our standards.

6. Principles of cooperation

6.1. In order to ensure success, it is our policy to work with our suppliers on the basis of the following principles:

- Work collaboratively with our suppliers in pursuit of these standards
- Ensure that our relationship with suppliers is fair and honest
- Welcome, rather than penalise, suppliers who recognise deficiencies in their practices, and strive to implement effective remedial action and work towards improving conditions and standards
- Focus attention on parts of our supply chain where the risk of not meeting standards is highest
- Assess suppliers to ensure they meet the requirements of our ethical standards via due diligence checks and auditing

6.2. Through these principles we aim to ensure the procurement of more sustainable business relationships.

7. Policy Review

7.1. The Compliance department is responsible for reviewing this policy annually, or as is required, to ensure that it meets legal standards and reflects best practice.