

Modern Slavery & Anti Human Trafficking Statement

de Poel UK Limited (de Poel) was founded in 2001 and provides neutral vendor services to high volume users of temporary labour in the UK. de Poel contracts with both hirers of temporary labour and temporary work agencies who supply the labour, across diverse sectors ranging from logistics and construction to food preparation and manufacturing.

Having been owner-managed for around 15 years, in December 2017, de Poel was acquired by **MSX International**, a leading global business process outsourcing company, headquartered in **Detroit, USA**.

The recent change to our business structure means that one of our priorities in 2018 is to understand the impact of the change on our approach to modern slavery awareness, prevention and reporting. We are publishing this statement in February as required, however it should be noted that a further update may be required once the implications of the recent acquisition are known.

As part of our ongoing commitment to preventing criminal slave traffickers from accessing our supply chain, over the past year, de Poel has taken several key steps which are summarised in our statement.

! What the law requires

The Modern Slavery Act 2015 requires de Poel to disclose annually online, as a minimum the following:

1. The organisation's structure, its business and its supply chain;
2. Its policies in relation to slavery and human trafficking;
3. Its due diligence processes in relation to slavery and human trafficking in its business and supply chains;

4. The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
5. Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
6. The training available to its staff involved in supply chain management and employees throughout the rest of the organisation.

Organisational Structure & Supply Chain

Commentary

The de Poel organisation is structured around providing high quality support to our clients. The majority of our staff work in Operations functions: in account management teams; fulfilment support; implementation and; operational audit teams. A relatively large technology function ensures the ongoing development of our e-tips® software. Supporting the operation are small functional teams of HR, Finance, Marketing and Business Development.

de Poel's sister company, **Umbrella Paraplius Limited** acts as a payroll umbrella company. This is an additional service which is utilised by some of our clients. This team has a unique role in de Poel terms as they have day to day telephone contact with agency workers.

Supply chain

de Poel's supply chain is primarily made up of temporary labour agencies in the UK, with whom de Poel contracts to provide labour directly to our clients who are also UK based. Individual workers supplied through our supply chain originate in many countries.



Policy Review

de Poel has a Modern Slavery Policy which is reviewed regularly. Additionally, in 2017 we have developed the following policy documents:

- Modern Slavery Response Plan
- Community & Sustainability Policy

We have reviewed a number of other policies to ensure that they reference modern slavery. These include our existing Disciplinary and Whistleblowing Policies.



Due diligence

All new client and agency agreements with de Poel contain a modern slavery compliance clause. In early 2018 we will be issuing a contract amendment notification to all existing clients and supplying agencies reflecting the requirements.

We have introduced a new agency onboarding process which includes completion of a modern slavery checklist and provision of policy documentation.

de Poel has the right to audit any agency upon reasonable notice.

In 2017, we have introduced an incident register to track concerns raised within our supply chain. To date we have been made aware of 3 concerns raised by clients. Further investigations into these concerns have not identified incidents of modern slavery.



Risk Assessment

Also in 2017, we undertook a desk-based risk mapping exercise of our supply chain. Using intelligence from Hope for Justice and other commentators in this field, we identified the sectors considered as high risk in which our clients operate.

Our desk-based analysis identified the role types supplied to these clients and the agencies supplying those roles. This analysis can also provide a geographical breakdown.

Waste



Catering



Social Care



Warehousing & Logistics



Manufacturing



We intend to prioritise the areas identified as high risk and our next steps will be to devise a focussed approach on ensuring awareness and support in these areas.



Training & Client Support

We undertook a pilot agency awareness programme, partnering with one of our clients and Hope for Justice to deliver awareness training sessions.

Using a similar format, we engaged with Hope for Justice to deliver client seminars and agency webinars at our headquarters and at a specific client site.

All new joiners to the business are required to complete a modern slavery e-learning module as part of their induction programme and to read the Modern Slavery Policy.

20% of existing staff in client, agency or worker facing roles have so far attended training on modern slavery. Further training is planned for 2018.



Performance Indicators

Staff Awareness – All staff are aware of the risks factors and process for reporting concerns.

Staff Induction – All new joiners receive a briefing on modern slavery and awareness of our policies in relation to it.

Staff Training – All operational staff receive training and ongoing updates to support their understanding and ability to respond to potential incidents or concerns.

Supply chain due diligence – All new clients and agency agreements reflect modern slavery compliance. Amendments to all existing agreements shall be distributed to clients and agencies.

Reporting – As awareness of our processes increase we anticipate increased reporting of potential incidents of slavery or human trafficking. We intend to report on this in our next statement.

Responding – We are aware that we do not have in-house expertise to provide a response or aftercare in the event of an incident of modern slavery being identified. It is our intention to engage in a partnership with an external agency to enable this.



Next steps

- Understand the impact of the de Poel acquisition by MSXI in terms of existing and future ethical supply chain management.
- Agree external partnership arrangements.
- Complete contract amendments for all existing clients and agencies.
- Continue training programme for existing operational staff.



Summary

de Poel has made good progress in its drive to minimise the risk of modern slavery anywhere in its supply chain. We recognise that this is an ongoing journey and we will continue our efforts to make our contribution to eradicate forced labour and human trafficking.



Andrew Preston
Chief Executive Officer
de Poel UK Limited