

THE PENINSULA GROUP MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

ORGANISATIONAL STRUCTURE

1. The organisational structure of the Peninsula Group of Companies, (referred to as “The Group”) comprises The Group holding companies, Rainy City Investments Limited and Peninsula Business Services Group Limited along with six operating companies in the UK, namely Peninsula Business Services Limited, Bright HR Limited, Health Assured Limited, Croner Group Limited, Peninsula Legal Services Limited t/a Irwell Law, and Croner-i Limited. There are also additional companies operating overseas, namely Peninsula Business Services (Ireland) Limited and Graphite HRM Limited in Ireland, Peninsula Australia Pty Limited, Irwell Law Pty Limited, Wisdom Wellbeing Pty Limited and BrightHR Pty Limited in Australia, Peninsula Group NZ Limited (New Zealand), and Peninsula Employment Services Limited and Bright HR Limited (Canada).
2. The Group is overseen by a Board of Directors. The Group’s Head Office is located in Manchester, with other UK offices located in London, Hinckley, Glasgow and Belfast. It also has offices overseas in Ireland, Canada, Australia and New Zealand.
3. The Group is predominately involved in the provision of business and legal services to other businesses in telephone, email, virtual and face to face consultancy formats. It offers a 24-hour advisory service for which demand is consistent throughout the year, focusing on employment law, HR and Health & Safety advice. In addition, the Group’s services include access to HCM software, accounting, audit and tax content & consultancy and the provision of wellbeing services.

DEFINITIONS

The Group considers that modern slavery encompasses:

1. **Human trafficking.** The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal
2. **Forced labour.** Any work or services people are forced to do against their will, usually under threat of punishment
3. **Debt bondage/bonded labour.** The world’s most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt (Australia’s Modern Slavery Act 2018 also refers to “Deceptive recruiting for labour or services” as a form of modern slavery)
4. **Descent-based slavery (where people are born into slavery).** A very old form of slavery, where people are treated as property, and their “slave” status has been passed down the maternal line.



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5. **Child slavery.** When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery
6. **Forced and early marriage.** When someone is married against their will and cannot leave. Most child marriages can be considered slavery
7. **Domestic servitude.** Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person's home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection

(Source: www.antislavery.org)

COMMITMENT

1. The Group acknowledges its responsibilities under the Modern Slavery Act 2015 as amended and is committed to preventing slavery and human trafficking within its own businesses and in its supply chains. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.
2. The Group has a zero-tolerance policy towards modern slavery. It will refrain from entering into business and will discontinue any current business with any other organisation which the Group believes may knowingly or recklessly support or otherwise involve itself in slavery, servitude and forced or compulsory labour.
3. The labour supplied to The Group in pursuance of the services it provides is carried out in the countries where those services are provided i.e. United Kingdom, Republic of Ireland, Australia, New Zealand and Canada as appropriate.
4. No labour provided to The Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, Republic of Ireland, Australia, New Zealand and Canada as appropriate, and in many cases exceeds those minimums in relation to its employees.
5. The Group offers employment contracts on a guaranteed hours basis only; no offers of employment are made on a zero hours basis.
6. Part-time and fixed-term employees within The Group are provided with the same pro-rata contractual entitlements as full-time and permanent employees. If these are not offered, The Group is able to rely on objectively justifiable grounds.
7. Group employees are offered a competitive remuneration package, and The Group prides itself on the additional benefits it is able to offer its employees on a wide variety of

platforms. It conducts staff surveys on an anonymous basis to give employees a voice on their individual employment, their department and The Group companies as appropriate.

8. The Group voluntarily uploads its annual modern slavery statement to the U.K. Home Office register for visibility and transparency.

POTENTIAL EXPOSURE

1. The Group considers its risk of exposure to modern slavery to be low. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.
2. In the operation of its business, The Group's main supply chains are those related to the provision of services. The Group considers its main, albeit low, exposure to the risk of slavery and human trafficking to exist in its supply chains.

STEPS

1. The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.
2. The Group has developed a Supplier Code of Conduct summarising expected standards of behaviour from vendors, and this specifically references the application of a zero-tolerance approach to modern slavery in all of its forms; this Code of Conduct began to be progressively communicated to the supply chain commencing 2023, focusing initially upon the U.K.
3. The Group will act upon reports of modern slavery which reference our supply chain. The Group will seek to discontinue business with any tier one supplier found by any relevant enforcement authorities or by any other legitimate source to be involved in modern slavery.
4. The Group encourages use of its whistleblowing policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.
5. Competitive Request For Proposal activities ("RFPs") led by Procurement will include an Ethical Sourcing Questionnaire with a section relating to modern slavery, and this is a mandatory return for all RFP respondents.
6. The Group has developed an ethical sourcing self-attestation statement for issue to new suppliers – this includes a requirement for any supplier to comply in full and at all times with applicable legislation relating to modern slavery, human trafficking and child labour.

- 7 The UK intranet now has a dedicated Procurement section which includes links to the ethical sourcing policy, the Supplier Code of Conduct, and the training collateral for Modern Slavery in the supply chain.

TRAINING

1. Upon commencement of employment, all employees undergo a structured digital induction process. All employees are made aware of The Group policies relating to standards of behaviour that it requires from them.
2. The Group supports training on awareness of modern slavery to those within The Group who have been identified as having responsibilities in this regard, namely those in Procurement roles.
3. A training video relating to modern slavery in the supply chain has been produced for the benefit of clients to raise awareness to a broader audience on an ongoing basis.
4. The UK intranet has a dedicated Procurement section which includes a link to the training collateral for Modern Slavery in the supply chain

ASSESSMENT OF EFFECTIVENESS IN COMBATTING MODERN SLAVERY

1. To ensure effectiveness in combatting modern slavery, The Group maintains an accurate supplier list. It will ensure swift, appropriate and proportionate action is taken in response to reports of modern slavery in its supply chains and any complaints made via the whistleblowing policy will be responded to in accordance with the policy.
2. As in the previous financial year, there have been no reports that any of The Group's suppliers have been involved in activities covered by the Modern Slavery Act.

POLICIES

A Whistleblowing policy is in place which encourages the reporting of any wrongdoing which is in the public interest. An Ethical Sourcing Policy exists which is explicit with regard to the Group having an expectation of a zero-tolerance approach to modern slavery within its supply chains.

DIRECTOR OF LEGAL SERVICES & GENERAL COUNSEL

The Group has a Director of Legal Services & General Counsel, to whom all concerns regarding modern slavery should be addressed. The Director of Legal Services & General Counsel

undertakes ongoing review of The Group's obligations towards eradicating modern slavery within its organisation and supply chains.

REVIEW

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and applies to all companies within and associated to The Group. It is reviewed for each financial year.

This statement relates to the 2024 / 2025 financial year and was approved by:

Ben Chaplin, Group Chief Financial Officer

Alan Price, Group Chief Operations Officer

On 28th August 2025