

Giant modern slavery and human trafficking statement

financial year ending 31st May 2024

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1st June 2023 to 31st May 2024.

The statement sets down our commitment to preventing slavery and human trafficking in our business activities at the **Giant Group** of companies and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them and we are operating a zero tolerance approach to slavery and human trafficking.

Organisational structure and supply chains

Giant Group is made up of a mix of companies, set up in different legal entities to provide a range of services, predominantly to the recruitment sector. Further details about our services can be found on our website www.giantgroup.com

This statement covers the following Giant companies and business activities:

Giant Professional Limited

Giant Professional Limited company registration number 07872025 with registered office and trading address being Fourth Floor, 90 High Holborn, London WC1V 6LJ.

We employ workers under a contract of employment, to work on temporary assignments for end clients. The assignments are usually sourced by recruitment agencies. **Giant Professional Limited** is responsible for the employment and payroll of these workers.

The supply chain normally runs as follows: The end client contacts a recruitment agency to source a worker to assist with its workload. A contract for services is normally signed between the two businesses. The worker advises the recruitment business that it wishes to be employed by **Giant Professional Limited**. **Giant Professional Limited** and the recruitment business agree and sign a contract for services. **Giant Professional Limited** employs the worker under a contract of employment.

Giant Professional Limited workers are based in and operate almost exclusively in the United Kingdom. Where the client requires for short-term overseas assignments, we will review to ensure that our policies are adhered to and our insurance covers these scenarios.

Giant Precision Limited

Giant Precision Limited company registration number 05075056 with registered office and trading address being Fourth Floor, 90 High Holborn, London WC1V 6LJ.

We provide global end to end managed software from onboarding & pre-employment screening to timesheets, billing and payroll. This service is concerned with complete end-to-end back-office technology – from contract management modules to bill and pay offering better temporary workforce management for its clients. Where required, **Giant Precision Limited** employs the temporary workforce by one of its direct wholly owned subsidiary companies – acting as the Professional Employment

Organisation. Subsidiaries covered by this statement include Giant Precision Resourcing Limited, Giant Business Connect Limited, Giant Precision Planning Limited, Giant Precision Contracts Limited, and Giant Employment Limited.

Giant Precision Limited workers, including those that are employed by its wholly owned subsidiary companies, operate almost exclusively in the United Kingdom. However, Giant Precision Limited has another wholly owned subsidiary in Lahore, Pakistan which employs highly qualified software developers, and back-office staff, to complement its own head office team in London.

Responsibility for the Company's anti-slavery initiatives

Michael Henry, Group Chief Financial Officer, is responsible for the organisation's antislavery initiatives, with the support of the Group Chief Legal & People Officer and the HR Manager. Their duties involve:

- The review and implementation of all policies relating to modern slavery risks.
- The identification of risks and steps needed to mitigate the risks of modern day slavery.
- To investigate and take due diligence steps in relation to known or suspected instances of slavery and human trafficking.
- To raise awareness of modern day slavery risks.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to attend regular company refresher training that includes the section on modern slavery policies in place at Giant Group.

Policies

We have developed a Modern Slavery Policy which reflects our

commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our Modern Slavery Policy is available on request.

Due Diligence Processes for Slavery and Human Trafficking

We will not support or deal with any businesses knowingly involved in slavery or human trafficking. The agencies we use for the supply of labour are reputable agencies and we expect them to follow the same modern slavery policies as we do. We follow a strict agency/client on-boarding process as follows :

- Completion of our New Agency/Client Form.
- Check the Company is registered with Companies House, incorporation date, director names, company accounts filings.
- Check the web domain.
- Check the Company VAT number(s).
- Credit check (if credit applicable).

We adhere to the national minimum wage (NMW) or national living wage (NLW) as appropriate. Our systems restrict us from processing a payment below the NMW/NLW and our employment contract with the worker also iterates this point.

As part of the on-boarding of new workers we complete ID verification, check the worker right to work, and that bank account details are in the name of the individual to ensure that payments are not made to a third party.

We continue to conduct further risk assessments to determine which part of our business, and which of our suppliers (if any), are most at risk of modern slavery, so that our efforts can be focused on these areas.

To ensure the effectiveness of our measures to prevent modern slavery, we have implemented the following key performance indicators (KPIs):

1. **Verification of Right to Work:** We aim for a 100% compliance rate in verifying the right to work for all employees.
2. **Wage Compliance:** Our target is to maintain a 100% compliance rate with minimum wage requirements.
3. **Incident Reporting:** We strive for zero incidents of modern slavery reported within our operations.
4. **Bank Account Verification:** We ensure that 100% of payments are made to bank accounts matching the verified identity and right to work checks.
5. **Training and Awareness:** We aim to train 95% of relevant staff on modern slavery awareness by May 2025.

Below are the KPIs for the current year:

KPI	Target	2023-2024 Metric	2022-2023 Metric
Percentage of workers successfully verified for right to work	100% compliance rate	100% compliance rate	100% compliance rate
Percentage of payments meeting or exceeding minimum wage requirements	100% compliance rate	100% compliance rate	100% compliance rate
Number of modern slavery incidents reported	Zero incidents	Zero incidents reported	Zero incidents reported
Payments made to bank accounts matching individual verified ID and RTW checks	100% compliance rate	100% compliance rate	100% compliance rate
Train our staff on modern slavery awareness by May 2025	95% of relevant staff	NA	NA

These metrics demonstrate our ongoing commitment to preventing modern slavery within our operations.

As part of our due diligence procedures, we will introduce contractual provisions for our suppliers to confirm their adherence to this policy.

We incorporate the Modern Slavery Policy into the joining process, such that the employee will be asked to read and acknowledge understanding of the Policy. We encourage our employees to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns, are able to contact the HR department on a confidential basis.

This is also incorporated into our compulsory annual compliance training for all HQ employees.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Giant Group's slavery and human trafficking statement for the financial year ending 31st May 2024. The statement has been approved by the director, who will review and update it annually.

A handwritten signature in black ink, appearing to read 'M Henry', is written above a solid horizontal line.

Michael Henry
Director & Group Chief Financial Officer
Giant Group