

MODERN SLAVERY STATEMENT

Statement for the financial year 2022

INTRODUCTION

This statement is made and published on behalf of Totaljobs Group Limited (“Totaljobs”) pursuant to section 54(1) of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement.

As required by the Modern Slavery Act 2015 (the “Act”), the statement illustrates the steps which Totaljobs has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains, or in any part of our own entities or business.

OUR BUSINESS, ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Totaljobs, Jobsite and its parent company Stepstone UK Holding Limited are part of StepStone Group, an international company that works with organisations across all sectors, governmental and regulatory bodies, and social charitable organisations both globally and locally by providing e-recruitment services. In total, we have 8 offices and over 1,642 employees working for Totaljobs.

Our business is office, and remote based and our primary supply chain categories assist the business by providing support in IT and technology, professional services, business travel, events and catering as well as recruitment agencies who provide us with business staff who are key to our operations. We tend to adopt a long-term relationship with these suppliers with regular renewals of contract to make certain, we proactively reassess their services and ensure their compliance are in position.

We also avoid making demands of our suppliers that might lead to them breaching human rights. For example, we require the contracts with our suppliers to include clauses showing commitment to modern slavery and human trafficking.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems to ensure slavery and human trafficking are not taking place anywhere in our business.

Although, we are generally assessed as being at low risk of modern slavery, we have implemented the following policies, anti-money laundering, whistleblowing protection, equal opportunities, anti-bribery and corruption and contract protocols (contract processes).

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. As part of our ongoing commitment to this, we have introduced a Modern Slavery Code of Conduct for our suppliers which sets out the minimum standards we expect from them in relation to slavery and human trafficking and requires that they hold their own suppliers to the same high standards. We have also reviewed and revised our standard terms and conditions for

recruitment agencies and other third parties we work with and who supply us with employees to ensure appropriate contractual provisions are in place. Furthermore, we keep our policies and processes under constant review to ensure compliance with the law and best practice.

INTERNAL STEPS TO ELIMINATE MODERN SLAVERY

We recognise that the greatest risk of modern slavery is in our supply chains; therefore, we have included another layer of protection by asking our suppliers to sign a supplier form to affirm that our they are regulated and reviewed before onboarding. The suppliers will have to sign a modern slavery code of conduct which sets out the standards we expect of them before we can set them up as one of our suppliers.

As noted above, our departments are working together to implement this new process which will ensure that we are engaging with suppliers who share our values and commitment to acting ethically and with integrity.

We have a dedicated team identifying risks in the area of modern slavery to ensure that our previous existing suppliers are demonstrating compliance. We apply robust policies and procedures to ensure all supplier information and modern slavery code of conduct are centralised. Thus far, we have not established any occurrence of modern slavery in our supply chain, nor have we identified any risks of modern slavery that we have not been able to resolve through additional due diligence or engagement with the supplier.

TRAINING AND MONITORING COMPLIANCE

Consistent with our risk-based approach we require employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.

As part of our ongoing assessment and due diligence processes, we will be carrying out audits of our suppliers for their compliance with our Code of Conduct, Anti-Slavery and Human Trafficking Policy and Modern Slavery Code of Conduct. In particular, we aim to:

- (i) ascertain our key suppliers who provide goods and services direct to our business;
- (ii) in relation to each of our suppliers, determine whether they pose a high, medium or low risk; and
- (iii) continue to assess those suppliers who are ranked as high risk.

We require suppliers to comply with all applicable laws and standards, including those that relate to the Modern Slavery Act and expect them to have appropriate policies and procedures in place within their business to prevent child labour, modern slavery and human trafficking in their own business and in their supply chains. As part of this, we have introduced a requirement for all new suppliers to provide a copy of their slavery and human trafficking statement or policy and provide support documentation as part of our due diligence process.

We have also appointed personnel who will be responsible for monitoring compliance and adherence to Totaljobs Group's values on an ongoing basis and implementing practices and programs that support these values.

TRAINING

Our policies provide a clear set of standards which underpin our commitment to tackling modern slavery. To ensure our policies are embedded in our culture and make employees aware of the

Modern Slavery Act 2015 and the drivers of modern slavery, we share this statement and provide information to our employees through our internal communication channels. Additionally, a copy of this statement is available on our website at <https://www.totaljobsgroup.com/responsibility>.

DECLARATION

This statement has been made in accordance with the reporting requirements of the Modern Slavery Act 2015, for the year ending 31 December 2022. This statement applies to all parts of the Stepstone UK Group.

This statement was approved by Management and has been signed by the Chief Executive Officer on

Signed: 
Date: 26/04/2022

Jon Wilson
Chief Executive Officer