



## **MODERN SLAVERY ACT 2015 (“the Act”)**

### **Modern Slavery and Human Trafficking Statement In respect of the financial year ending 31 December 2021**

#### **Introduction**

FDM Group is committed to acting ethically and with integrity in all its business dealings and relationships. Modern slavery is a crime and a violation of fundamental human rights, and we have established systems and controls to help us to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

#### **FDM Group’s Business Structure**

FDM Group (Holdings) plc has a premium listing on the London Stock Exchange and is, together with its subsidiaries (**FDM Group**), a global professional services provider operating in the Recruit, Train and Deploy sector. FDM Group’s principal business activities involve recruiting, training and deploying our own permanent IT and business consultants with our clients. They work across a range of technical and business disciplines including Development, Testing, IT Service Management, Project Management Office, Data Services, Business Analysis, Business Intelligence, Murex, Salesforce, Cyber Security and Robotic Process Automation.

FDM Group has dedicated training centres and sales operations located in London, Leeds, Glasgow, New York NY, Arlington VA, Charlotte NC, Austin TX, Toronto, Frankfurt, Singapore, Hong Kong, Shanghai and Sydney. We also operate in Ireland, Luxembourg, the Netherlands, Poland, Switzerland, Austria, Spain, South Africa, and New Zealand. We have established partnerships with key universities, enabling us to recruit high quality graduates to train as consultants.

FDM Group is a proactive and enthusiastic promoter of diversity, social mobility and inclusion. Our workforce of more than 5,500 people comes from around 85 different nationalities and a wide range of backgrounds and local cultures. We aim to reflect the diversity of education, culture, age, ethnicity, gender and disability found in the communities in which we operate, and to ensure that our behaviours are acceptable across all these communities. We encourage and support the recruitment of women into the IT industry, promoting their advancement through the “FDM Women in IT” initiative. We also actively recruit ex-Forces personnel in both the UK and the USA, and our “Getting Back to Business” pathway helps workers who have had a career break to learn new skills and gain the confidence to re-enter the workplace.

#### **Our Supply Chains**

Our primary supply chain activity is the recruitment of graduate candidates from universities in the locations where we operate. We also recruit more experienced candidates for our ex-Forces and Returners to Work programmes. We procure IT and office equipment, facilities and related services (such as cleaning, catering and similar office-related support services) for our offices and training academies around the world.

#### **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business, and this is reflected in our Anti-slavery and Human Trafficking Policy. We continue to review our supply chains and to consider the risk that modern slavery could arise. We maintain close partnerships with the universities from which we recruit graduates, and have direct relationship with all applicants to our training programmes. We believe that the nature of our business and supply chains, when combined with these factors, means our policies ensure that the risk of modern slavery in our own organisation is low.

We ensure that all our employees are treated in a fair and equal manner with dignity and respect, and have in place policies which prohibit any form of discrimination, victimisation or harassment. We have a growing programme of employee engagement to ensure that the views and any concerns of our staff are heard by management and our Board of Directors. We carry out full checks on all applicants and ensure that they have a right to work in the location where we are recruiting them.

**Our Review of Risk**

We audit our organisation to establish that we are compliant with applicable minimum wage regulations and working hour restrictions across all jurisdictions in which we operate. Our account managers ensure continued compliance with these requirements through communications with our client line managers and regular monitoring by our billing and payroll teams. We have also confirmed that we are compliant with overtime regulations in those jurisdictions which have them.

FDM Group became an early adopter of the UK’s Gender Pay Gap reporting policy, with a median Gender Pay Gap of -9.6% in the 2021 reporting year (2020 reporting year: -2.1%). The mean Gender Pay Gap in the 2021 reporting year was 0.5% (2020: 0.4%).

**Our Due Diligence Processes**

We continue to implement a process of due diligence on our existing key suppliers to ensure compliance with our policy and with our obligations under the Act. We have further enhanced our procurement policies and procedures during 2021 to ensure appropriate levels of due diligence are carried out on any new major suppliers which we may appoint in the future. We have developed a set of standard contractual clauses for inclusion in supplier contracts (where appropriate) which are intended to ensure that suppliers confirm their commitment to comply with our policies and values or that they have in place appropriate equivalent policies of their own.

These processes are intended to identify and assess potential risk areas in our supply chains and to mitigate that risk as far as it is reasonably possible to do so.

**Training**

We aim to promote a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, and we familiarise all staff with our policies on induction. Where appropriate, we will provide additional training on the risks of modern slavery to those of our staff who are engaged regularly with our supply chains.

**Monitoring Effectiveness**

Our compliance with our policies is monitored and implemented by our legal, governance and HR teams. We will review the effectiveness of our new policies and report regularly to our board of directors, when we will make recommendations on any additional steps which we believe will further mitigate the risk of modern slavery in our organisation and its supply chains. During 2020 our internal audit function carried out a review of our procurement policies and procedures and in 2021 they followed up on progress with our ongoing programme of enhancements in this area.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes FDM Group's slavery and human trafficking statement for the 12-month period ending 31 December 2021.



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Rod Flavell, CEO  
On behalf of the Board of Directors  
FDM Group (Holdings) Plc

Approved by the Board of Directors on 25 January 2022