



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

### **Modern Slavery and Human Trafficking Statement In respect of the financial year ending 31 December 2018**

#### **Introduction**

FDM Group is committed to acting ethically and with integrity in all its business dealings and relationships. We recognise that 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 is listed on the London Stock Exchange and is, together with its subsidiaries (**FDM Group**), a global professional services provider with a focus on IT. FDM Group’s principal business activities involve recruiting, training and placing our own permanent IT and business consultants at our clients’ sites. They work across a range of technical and business disciplines including Development, Testing, Support, Project Management, Business Analysis, Business Intelligence and Risk, Regulation and Compliance. We also supply contractors to customers, either to supplement our own employed consultants’ skill sets or to provide greater experience where required.

FDM Group has training academies and sales operations in dedicated facilities located in London, Leeds, Glasgow, New York, Reston, Austin, Toronto, Frankfurt, Hong Kong, Singapore, and Sydney. In addition, we operate a sales presence in mainland China, Ireland, France, Switzerland, Luxembourg, Austria. We have established partnerships with key universities, enabling us to recruit high quality graduates to train as consultants.

We are a strong advocate of diversity and inclusion in the workplace, with people from around 72 nationalities working together as a team. 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, as well as having a “Returners to Work” programme in the UK, Hong Kong, Singapore and Canada aiding those workers who are ready to re-enter the workplace after a career break.

#### **Our Supply Chains**

Our supply chains include, amongst others, recruiting candidates for our graduate training and consultant programme, as well as procuring IT and office equipment, facilities and related services (such as cleaning, catering and similar office-related support services) for our offices and graduate 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 have further developed the review of our supply chains which we commenced in 2016, and continue to consider the risk that modern slavery could arise. Due to the nature of our business and our supply chains, and our direct relationship with applicants to our graduate training programme, we consider that the risk of modern slavery in our own organisation is relatively 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

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 have carried out a detailed audit of 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 zero percent in both the 2017 and 2018 reporting years, and a mean Gender Pay Gap of only 6% in 2017, falling to 5.7% in the 2018 reporting year (UK average 14.1%).

### **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 also have in place a pre-contract due diligence process which can be carried out where appropriate 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. We are rolling out a new training module for our staff training portal to ensure that all our employees understand the importance of our continuing compliance in this area.

### **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.

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 2018.



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

28 February 2019