



PENINSULA

THE PENINSULA GROUP 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 seven 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, Croner Taxwise Limited and Croner-i Limited. There are also six companies operating overseas, namely Peninsula Business Services (Ireland) Limited and Graphite HRM Limited in Ireland, Employsure Pty Limited and Employsure Law Pty Limited in Australia, Employsure Limited (New Zealand) and Peninsula Employment Services Limited (Canada).
2. The Group is controlled 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 both telephone, email and face to face consultancy formats. It offers a 24 hour advisory service for which demand is consistent throughout the year.

DEFINITIONS

The Group considers that modern slavery encompasses:

1. Human trafficking;
2. Forced work, through mental or physical threat;
3. Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
4. Being dehumanised, treated as a commodity or being bought or sold as property;
5. Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

1. The Group acknowledges its responsibilities under the Modern Slavery Act 2015 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.



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2. The Group has a zero tolerance policy towards modern slavery. It will refrain from entering into business, and/or will discontinue any current business with any other organisation which knowingly supports or is found to 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 wholly 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 company as appropriate. Commitment to creating career progression in a supportive environment has been rewarded by high placings for Peninsula Business Services Limited in well regarded “Best Places to Work” awards.

POTENTIAL EXPOSURE

1. The Group considers its exposure to modern slavery to be limited. 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 exposure to the risk of slavery and human trafficking to exist in its supply chains.



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IMPACT OF COVID-19

1. The Group concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic which, as set out under 'POTENTIAL EXPOSURE' above, is assessed as limited.
2. Despite an increase of over 300% in demand for its advisory services in the early stages of the pandemic, no additional temporary staff were recruited.
3. During the period of homeworking, the Group's employees still had access to the grievance procedure.
4. In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.
5. The Group's modern slavery risks were subject to the same monitoring procedures during and around lockdown as at all other times.

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. In accordance with section 54(4) of the Modern Slavery Act 2015 (the Act), The Group has contacted (or attempted to contact) all first tier suppliers to set out our zero tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place.
3. The Group has taken action to monitor reports of modern slavery and cross references such reports with our first tier supply chain. The Group will seek to discontinue business with any first tier supplier found by the enforcement authorities 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.

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.



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2. The Group also provides training on awareness of modern slavery to those within The Group who have been identified as having responsibilities in this regard, namely those involved in finance and procurement. The Group ensures that annual update training is provided.

ASSESSMENT OF EFFECTIVENESS IN COMBATTING MODERN SLAVERY

1. To ensure effectiveness in combatting modern slavery, The Group maintains an accurate supplier list including contact details. It will ensure 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. Following a review undertaken for The Group's statement of the previous financial year, The Group confirms its supplier list is up to date for the current financial year.
3. 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

The Group also has a Corporate Social Responsibility Policy which further defines its stance on modern slavery. In addition, a Whistleblowing policy is in place which encourages the reporting of any wrongdoing which is in the public interest.

DIRECTOR - LEGAL

The Group has a Director - Legal, to whom all concerns regarding modern slavery should be addressed. The Director - Legal undertakes an annual 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 2020/2021 financial year and was approved by:

Peter Swift, Group Chief Financial Officer

Alan Price, Group Chief Operations Officer

On 29th September 2021

Financial year 2020/2021