

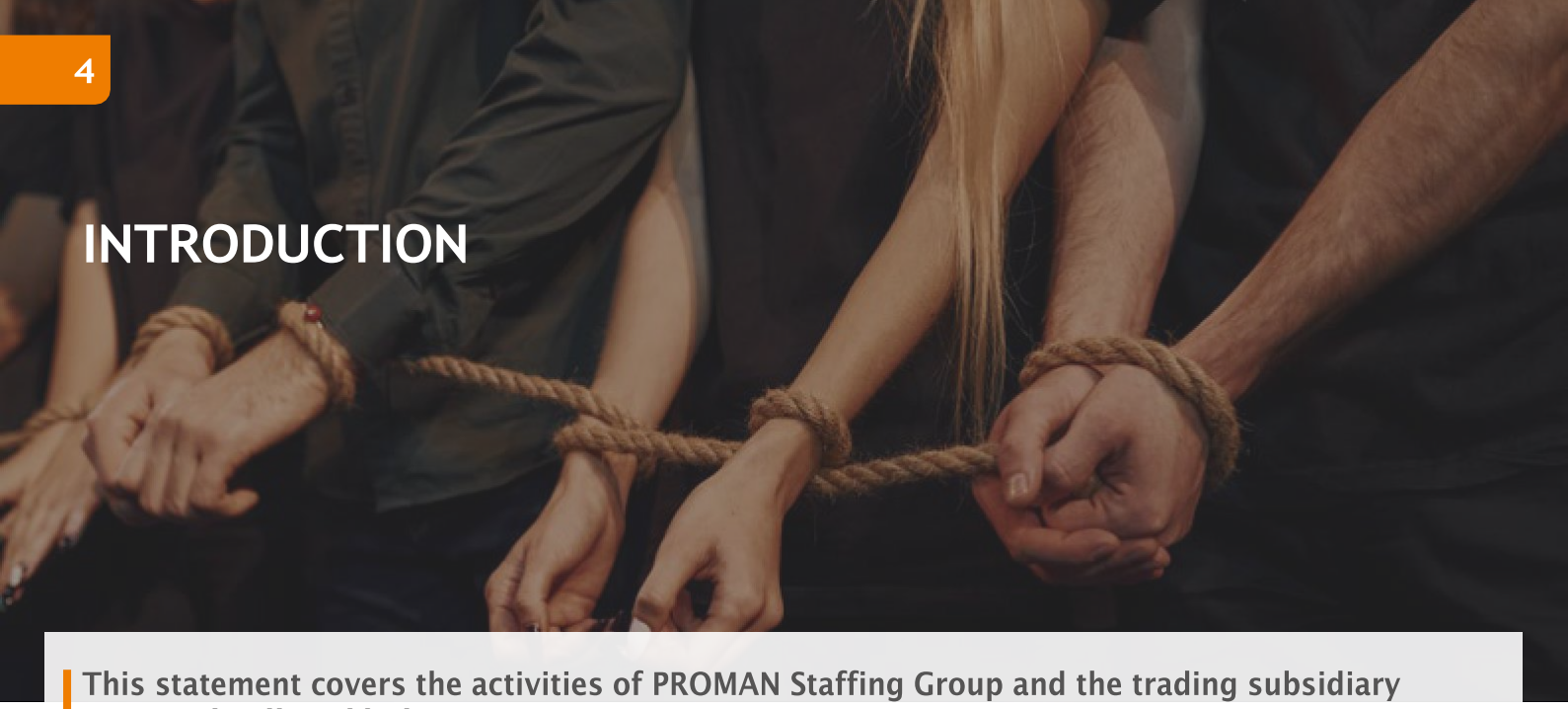
Labour Exploitation Statement - 2026

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INTRODUCTION

This statement covers the activities of PROMAN Staffing Group and the trading subsidiary companies listed below:

> PROMAN Recruitment Limited

> PROMAN Supply Chain Limited

> PROMAN Managed Services Limited

It has been published in accordance with the Modern Slavery Act 2015 and details the action taken by PROMAN to prevent and combat modern slavery and human trafficking within our business and supply chain.
Modern slavery is a crime and a violation of fundamental human rights which is estimated to effect c.50 million victims worldwide. It takes various forms; slavery, servitude, forced and bonded labour; and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
According to Home Office data, in 2025, 23,411 potential victims of modern slavery were referred to the Home Office, a 22% increase on the previous year and the highest annual figure recorded since the National Referral Mechanism began in 2009. The PROMAN Staffing Group recognise the need to raise awareness and to be proactive in working to prevent all aspects of modern slavery. We are committed to acting transparently, ethically and with integrity in all our business transactions and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in our supply chains.

POLICY STATEMENT

PROMAN commits to developing and adopting a proactive approach to tackling hidden labour exploitation. This includes exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work- finding services and work-related exploitation such as the forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims if they perceive of themselves as such, reluctant to come forward.

PROMAN have a zero-tolerance approach to modern slavery and expect all who have, or seek to have, a business relationship with PROMAN, to familiarise themselves with our anti- slavery and human trafficking policy and to act at all times in a way which is consistent with this policy.

COVERAGE

PROMAN currently operates across the United Kingdon and the Republic of Ireland.

RESPONSIBILITY

The Co-Managing Director (Corporate Resources), members of the Tackling Modern Slavery Committee (TMSC) and the Compliance Team are responsible for the deployment of this policy and accompanying procedures to Branch Managers, Account Managers, Payroll staff and our Clients.

COMMITMENTS

PROMAN commits to:

1. The Compliance Manager attending "Stronger Together Advanced Tackling Modern Slavery in UK Businesses" training and to have responsibility for further developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost, and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for and have signed appropriate Compliance Principles.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Labour Abuse Authority (GLAA) and police.
6. Provide information on tackling "Hidden Labour Exploitation" to our employees and our Agency Worker workforce through a variety of formats such as workplace posters, worker leaflets, inductions, and assignment information.
7. Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities by raising awareness and reinforcing cultural intolerance of any kind of exploitation of individuals in UK.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

This statement is made as part of PROMAN's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how PROMAN operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

OUR BUSINESS

"PROMAN" is the trading name of a group of limited companies operating in the recruitment sector. We provide introduction services and supply temporary workers in the Supply Chain, Engineering and Construction Sectors since 1983.

The group of companies trading as "PROMAN" includes PROMAN Supply Chain Ltd (Company Number 3443013), PROMAN Managed Services Ltd (Company Number 4163986), and PROMAN Recruitment Ltd (Company Number 9907561). Our permanent and executive search function also trade under "Winsearch".

In 2025 PROMAN had a turnover in excess of £128 million in the UK, payrolling over 12,500 Agency Workers in the Supply Chain sectors, including warehousing and manufacturing, with under £10 million turnover in GLAA licensed sectors.

WHO WE WORK WITH

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies. Some of our work-seekers are supplied via other businesses, which facilitate providing them to the eventual hiring company.

OUR SUPPLY CHAINS

Our supply chains are limited to those individuals and organisations who provide PROMAN with the goods and services needed to operate its business, such as the sourcing of labour, stationery, workwear, PPE, facilities, telecoms and IT equipment; and other materials principally related to the provision of our services, construction, integrated services and installation and maintenance.

All the companies within the supply chain and the workers that we work with and supply are located within the UK.

OTHER RELATIONSHIPS

As part of our business, we also work with the following organisations:

> The Gangmasters & Labour Abuse Authority (gla.gov.uk)

> Stronger Together (www.stronger2gether.org)

> The Recruitment and Employment Confederation (www.rec.uk.com) and the Institute of Recruitment Professionals (www.rec-irp.uk.com)

> The Association of Labour Providers (www.labourproviders.org.uk)

> Constructionline (www.constructionline.co.uk)

STRONGER TOGETHER

stronger together 2026 BUSINESS PARTNER ADVANCED

Proman supports Stronger Together, a multi-stakeholder initiative aimed at reducing modern slavery, particularly within labour supply chains.

Proman have been a stronger Together Business Partner since 2015 and have uploaded evidence to publicly demonstrate their commitment to tackling hidden labour exploitation.

OUR POLICIES

PROMAN has a Tackling Modern Slavery policy available here.
In addition, Proman has the following policies which incorporate ethical standards for our staff and our suppliers.

> Anti-Bribery Policy

> Human Rights - Ethical Trading Policy

> Whistleblowing Policy

> Annual Policy development and review

PROMAN's policies are established by our directors, based on advice from HR professionals, industry best practice and legal advice, and in consultation with the Recruitment and Employment Confederation. We review our policies annually or as needed to adapt to changes.

OUR PROCESSES FOR MANAGING RISK

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

> When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.

> We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.

> We review the potential for risk at regular intervals, including the possibility of re- auditing a supplier or conducting spot checks.

After due consideration, we have identified the following potential risks in our supply chain:

> Sector risks, because there may be substantially different working practices between different sectors,

> Business partnership risks, acknowledging that different relationships your business has may have different risks associated with them. This can involve a variety of factors including knowledge and familiarity with the other business's working practices, the length of the relationship, and any due diligence (audits etc.) you have conducted.

Additionally, we have taken the following steps to minimise the possibility of any problems:

> We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.

> We require the businesses we work with to address modern slavery concerns in their policies.

> We collaborate with our suppliers in order to improve standards and transparency across our supply chain.

> Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in an area where we have identified the potential for risk.

> We ensure that all of our suppliers are members of appropriate industry bodies and working groups.

> We work with "Stronger Together", "Gangmasters and Labour Abuse Authority (GLAA)", "Association of Labour Providers (ALP)" and the "Recruitment and Employment Confederation" in order to combat the risk of modern slavery and human trafficking.

> Our employees are encouraged to report concerns using the available reporting channels, all reports are investigated and if applicable the relevant authorities contacted. Employees that report concerns whether openly or confidentially, will be taken seriously and receive full protection under our Whistleblowing Policy. All policies are available on our website and our Employee Handbook.

OUR TRAINING AND RAISING AWARENESS

In order to raise awareness and to ensure a consistent and up to date knowledge of all our Modern Slavery processes and protocols we have and continue to;

- Provide Modern Slavery training for recruitment employees
- Display and promote the Modern Slavery Helpline & Stronger Together on our website, Employee platforms, communications and handbooks and visual materials in our locations
- Systems to "restrict and check" employees using shared or others bank accounts
- Red Flag checks of multiple use of the same addresses
- Red Flag checks of multiple use of the same contact details including mobile numbers and email
- Red Flag checks of multiple use of the same emergency contact details

To ensure a high level of understanding of the risks of modern slavery and human trafficking we have mandatory e-learning for all of our employees involved in recruitment or the management of our supply chain. All our recruiters complete training and acknowledge their understanding via our Recruiter Compliance Principles.

PROMAN raise awareness of modern slavery issues by publishing and emailing our Modern Slavery Statement (recommunicated annually) to all employees via our HR Platform, Learning Management System (LMS) and Employee Handbook including; all training materials, policies and information on how to report any suspected / confirmed instance of modern slavery.

PROMAN utilise up to date training resources of Stronger Together to provide Modern Slavery workshops for all employees which covers:

- What modern slavery, human trafficking and bonded and forced labour are
- Identifies the benefits for tackling modern slavery to the individual, the team and the business/ industry
- The impacts of modern slavery through examples
- How to deter and detect hidden exploitation including spotting the signs
- How to protect potential victims and evidence

OUR PERFORMANCE

As part of monitoring the performance of Proman and we track the following general key performance indicators:

- Number of operations staff complete training and assessment relating to 'tackling modern slavery' process and procedures.
- Number of multiple occupancy addresses identified and investigated unsatisfactorily
- Number of 'red flagged' bank accounts identified and investigated unsatisfactorily
- Number of 'red flagged' contact details identified and investigated unsatisfactorily
- All modern slavery complaints are acknowledged within 48 hours and investigated within 7 days.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our board of directors:

- The level of modern slavery training and awareness amongst our senior managers and Directors
- Potential trends and analysis in above 'red flag reports'
- Influence on our supply chain or client base of our Modern Slavery awareness commitment and actions.
- Reports of possible incidents of Modern Slavery and engagement with GLAA or the Police.

We carefully consider our indicators, in order to ensure that we do not put undue pressure on our employees that might increase the potential for risk.

Key Performance indicators:

KEY PERFORMANCE INDICATORS	2024	2025
Number of Employees trained (including refresher)	75	97
Number of Satisfactory investigations of “Red Flags”	206	213
Number of Unsatisfactory investigations of “Red Flags” escalated to authorities and/or GLAA	0	0
Number of Modern Slavery complaints investigated outside 7 days	0	0
Number of Agency Worker confidential interviews completed	62	81
Number of potential ‘Imposter Fraud’ cases identified and passed to Home Office Immigration Enforcement	32	37

OUR PLANS FOR 2026

STRONGER TOGETHER BUSINESS PARTNER ADVANCED

To further demonstrate our ongoing commitment to tackling modern slavery and supporting victims, PROMAN are committed to maintaining Stronger Together Business Partner Advanced status in 2026.

PROACTIVE PROCESSES

In line with previous years, PROMAN will again look to increase the number of confidential interviews carried out at high volume users of Agency Workers. This is an ongoing effort to gather intelligence aimed at identifying potential victims and minimising any opportunities for organised crime to infiltrate our supply chain.

PROMAN will also implement internal reviews of employees to gather intelligence to identify any potential exploitation within the business that to minimise and eradicate any exploitation of colleagues.

TACKLING MODERN SLAVERY COMMITTEE

The TMSC, constituted from across all divisions and levels of our business, will continue to meet on a quarterly basis to discuss metrics, best practice, issues with and continuous improvement of our processes.

EXTERNAL ENGAGEMENT

PROMAN commits to engage with more 3rd party organisations to share information aimed at tackling Modern Slavery, including GLAA, The Home Office Immigration Enforcement, UK Visa & Immigration and National Referral Mechanism, if appropriate.

PROMAN will continue to promote awareness of potential worker exploitation with both new and existing clients and encourage the posting of Stronger Together literature in prominent locations on site.

AUTHORISATION

This statement is published in accordance with section 54 of the Act and relates to the financial year Jan 2026 to Dec 2026.

Patrick Ramsdale

Co Managing Director (Corporate Resources)
April 2026



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