



THE ADECCO GROUP

Modern Slavery Act Transparency Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the Adecco Group UK&I (“we” or “our”) to prevent modern slavery and human trafficking in its business and supply chains during the year ending 31 December 2019, and covers the following legal entities:

- Adecco UK Limited
- Ajilon (UK) Limited
- Badenoch & Clark Limited
- Modis International Limited trading as “Modis” and “Ajilon”
- Office Angels Limited
- Penna Plc
- Pontoon Europe Limited
- Roevin Management Services Limited
- Spring Technology Staffing Services Limited

Our Business:

We have a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains. This is our fourth statement and we are continuing to strengthen our work in this area.

We supply recruitment services and are part of the Adecco group of companies (“The Adecco Group”), the global leader in HR solutions providing 360° services to individuals and organisations to successfully navigate through the entire work life cycle. We lead by example, creating shared value that meets social needs while driving business innovation.

We are also members of the Recruitment and Employment Confederation (REC), and we work closely with REC to improve industry-wide standards and advocate improved laws and policies that fit with our UK&I purpose of “Creating Brighter Futures”.

Our Global Commitment to Human and Labour Rights:

At the Adecco Group, we aspire to positively influence the world of work and lead by example in how we conduct our business and address society’s most pressing challenges. Through our core business of providing access to livelihoods and opportunity we create social and economic value for our stakeholders.

Every day, we provide work for hundreds of thousands of colleagues and associates and directly and indirectly impact the lives of many more. Ensuring respect for human and particularly labour rights within our sphere of influence, across our value chain and wherever we do business is and must be a fundamental part of how we operate. It is a key contribution we can make to help achieve the Sustainable Development Goals.

We have a long history of promoting human rights. As an HR solutions provider, we have a double responsibility when it comes to human rights, especially labour rights: towards our own colleagues, but also towards the associates whom we offer access to work with our clients. We are committed to fair and ethical recruitment practices and are seeking to continuously strengthen the ways in which we protect the rights of our employees, associates and candidates. We seek to take a leading role in our industry, as well as in the wider business community, working together to achieve quality employment.

In our commitment to workers' rights, we embrace some of the most authoritative international resources in this field:

- Universal Declaration of Human Rights;
- International Labour Organisation (“ILO”) Declaration on Fundamental Principles and Rights at Work;
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- OECD Guidelines for Multinational Companies; and the
- UN Guiding Principles for Business and Human Rights.

The Adecco Group was the first organisation in our industry to sign the United Nations Global Compact. The Adecco Group globally is also an active member of the World Employment Confederation (WEC) and a committed signatory to the WEC Code of Conduct, which sets the gold standard for the employment and recruitment industry.

At the Adecco Group, we have numerous commitments, policies, procedures and corresponding training that translate these standards into our daily business. This includes for example, our Code of Conduct, Human and Labour Rights Guidelines, relevant HR policies, our supplier code of conduct, data protection policy, and our principles for the ethical use of AI. Human rights furthermore form an integral part of our risk management, integrity and compliance, and audit frameworks. We increasingly seek to collaborate with stakeholders on human rights related questions, given our shared responsibilities and objectives in this area, to change realities on the ground and advance respect for human rights.

As a leader in the world of work, we are also vocal advocates for a new social contract, highlighting the need for social security systems to catch-up with the way that people work in the 21st century, to guarantee appropriate protections for all workers - permanent, temporary, or freelance. We are also leading the debate on how companies and governments should rethink workforce investment and account for human capital, to incentivise organizations to address skills shortages and employability challenges.

Through the Adecco Group Foundation, we extend our positive impact, focusing on two key areas: work readiness for the underserved, whose potential is often overlooked, and workforce vitality, finding solutions to nurture a workforce that is healthy, resilient, and fit for purpose. Our ambition is to marry social value with sustainable business to create more value for all our stakeholders.

We will continue to challenge ourselves to ensure fair working conditions and respect for human rights within our sphere of influence, and strive to be at the forefront of creating brighter futures for all.



Local Policies and their Implementation

Our Anti-slavery and Human Trafficking Policy (“the Anti-slavery Policy”) reflects our commitment to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and supply chains. Our Anti-slavery Policy sets out our zero-tolerance approach to modern slavery and human trafficking. Every member of staff is expected to comply with the policy, which includes raising any concerns and using the appropriate reporting channels at the earliest possible stage.

We also operate a Whistleblowing Policy that encourages all staff to report any wrongdoing (including any breaches of the Anti-slavery Policy). In particular the Whistleblowing Policy refers to a number of reporting tools designed to foster an environment of open, honest communication including the Adecco Compliance and Ethics (“ACE”) Website:

<https://secure.ethicspoint.com/domain/media/en/gui/7017/report.html>

and the Adecco Compliance and Ethics Line:

<https://secure.ethicspoint.com/domain/media/en/gui/7017/phone.html>.

Both internet and telephone reporting are available 24 hours a day, 7 days a week, anonymously if wished. All reports will be fully investigated and remedial action and escalation to our board of directors will follow if appropriate. Any colleague who in good faith seeks advice, raises a concern or reports misconduct is doing the right thing. The Adecco Group will not tolerate retaliation against that person for raising a concern. Allegations of retaliation will be investigated and appropriate action taken. All policies are available to staff at all times via our internal intranet system.

Alternatively, for more information or guidance, or to report a case of modern slavery, the government’s Modern Slavery Helpline may be contacted directly on 0800 0121 700.



Supplier Code of Conduct

We have a long-standing approach to supply chain responsibility and expect our suppliers to agree and adhere to our ethical standards for doing business. These standards require (without limitation) suppliers to:

- refrain from holding a person in slavery or servitude or requiring a person to perform any form of forced or compulsory labour;
- not arrange or facilitate the trafficking of any persons;
- not purchase materials or services from companies who use involuntary labour or participate in human trafficking;
- operate in accordance with the United Nations Universal Declaration of Human Rights (“UN UDHR”), and the fundamental human rights and labour rights as articulated by the International Labour Organisation (“ILO”);
- treat and reward employees equally on the basis of the characteristics of their work and the intensity of their effort;
- provide, while taking into account the specific dangers of the relevant sector, for safe, hygienic, and healthy working environments for their employees;
- provide, as a minimum, rates of pay at the national legal standards; and
- act in accordance with applicable national and regional laws and regulations at all times.



As part of our commitment to continuous improvement, we committed in our previous statement to further increase the due diligence we carry out on new suppliers, in addition to the commitments we already sought from our umbrella companies and consultancies. To that end, we have revised our supplier questionnaire and our standard supplier agreement to ensure our supply chain shares our values and makes reciprocal commitments to manage any risk of modern slavery, and ensures appropriate training of their own staff.



Training

In our previous statement we outlined the steps we had taken to increase internal awareness on identifying and responding to incidents of modern slavery and human trafficking, which included updating our internal guidance and providing details for the government's Modern Slavery Helpline. In 2019, key Modern Slavery stakeholders undertook training with Stronger Together to further improve our capabilities in this area. Bespoke inhouse training has subsequently been written and this will be rolled out to front line sales consultants in 2020.

In addition to creating this training, we have also raised awareness of modern slavery issues by sharing articles on our intranet reminding staff of key areas to look out for when registering new candidates or taking on new clients, as well as raising awareness of Anti-Slavery Day.

Client Premises

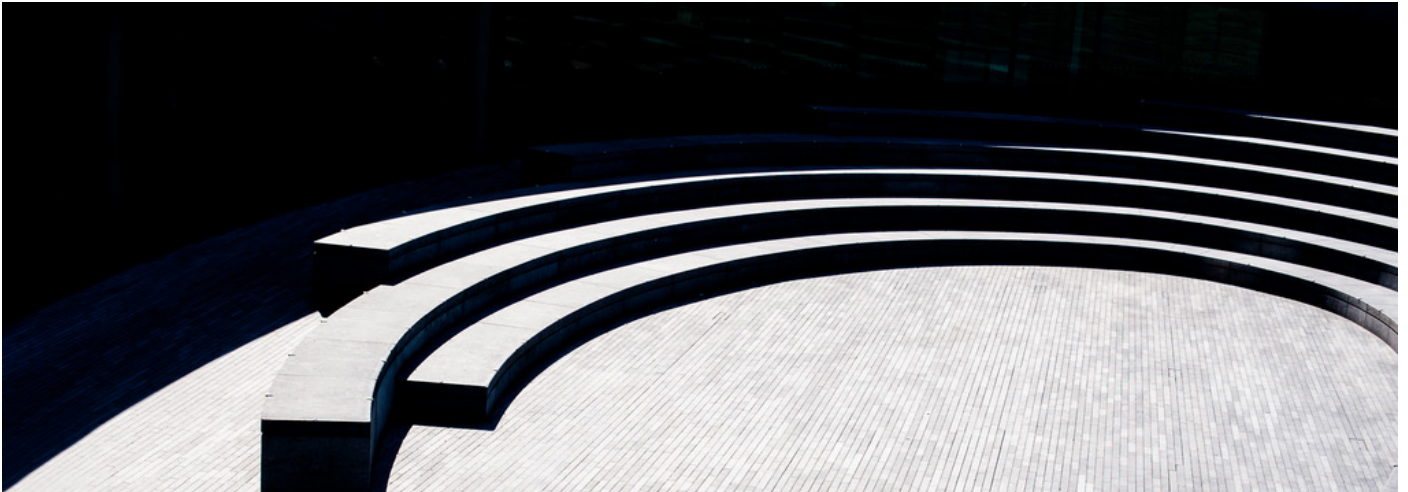
In 2019, we committed to working more closely with our clients to ensure respect for human rights along the full value chain. As a business we are committed to talking openly to our clients about this topic, and to ensuring that we work together to identify and combat any risk. We encourage our clients in high risk sectors to display Stronger Together posters to increase the visibility of this topic for the benefit of all workers at their premises. Where we use second tier suppliers to indirectly supply workers to these clients, we have enhanced our contractual requirements, and in 2020 we will seek to increase our scrutiny of those suppliers still further.



Risk Assessment and Due Diligence Processes

The risk of slavery and human trafficking within our organisation is mitigated by the existence of our policies, and the knowledge and skill of our staff. We consider that the most significant risk is in our supply chain, and we therefore have in place systems to:

- identify and assess potential risk areas in our supply chains by asking suppliers to complete a questionnaire and provide information which allows us to determine the level of risk;
- audit prospective suppliers based on the level of risk;
- mitigate the risk of slavery and human trafficking occurring in our supply chains by asking our suppliers key questions; and
- protect whistle blowers by providing a confidential helpline.



Our Effectiveness in Combating Slavery and Human Trafficking

We have HR, Legal and Compliance teams dedicated to ensuring compliance with law, policy and process across the business. We review our policies and procedures on a regular basis to ensure ongoing compliance.

As part of our ongoing review in this area, two senior stakeholders undertook Stronger Together training in 2019 to ensure that as a business we were able to appropriately identify, investigate and report any Modern Slavery Issues.

In 2020 we propose to establish a formal UK & I Sustainability Steer Co, with our UK&I Group Legal Director being designated formal responsibility for tackling Modern Slavery to improve our internal governance and board oversight of this important topic.



Further Steps

As an organisation, we are committed to building on what we do each year to prevent modern slavery and human trafficking. Following a review of the effectiveness of the actions we have implemented, in 2020 we intend to:

1. Roll out formal training to all sales consultants and other key staff;
2. Enhance our processes around worker record analysis to identify risk areas such as multiple workers having the same contact telephone numbers, address or bank details;
3. Carry out a retrospective audit of any of our suppliers who are operating in high risk areas;
4. Continue to explore how we may work more closely with our clients to ensure respect for human rights along the full value chain.

This statement was approved by the board of directors on 25th February 2020 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



Alex Fleming