



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 & Ireland (“we” or “our”) to prevent modern slavery and human trafficking in our business and supply chains during the year ending 31 December 2022. This statement covers the following legal entities across our Adecco, LHH and Akkodis business units:

- Adecco UK Limited
- Adecco Ireland Limited
- Ajilon (UK) Limited
- AKKA Developments UK Limited
- Badenoch & Clark Limited
- Lee Hecht Harrison Penna Limited
- Modis Europe Limited trading as “Akkodis”
- Modis International Limited trading as “Akkodis”
- Office Angels Limited
- Penna Plc
- Pontoon Europe Limited
- Roevin Management Services Limited
- Spring Technology Staffing Services Limited

Our Business:

The Adecco Group is the world’s leading talent solutions and advisory company. We are driven by a powerful global purpose – to make the future work for everyone. Our 360° solutions enable sustainable, lifelong employability for individuals and empower organisations to optimise their talent needs and organisational models to achieve their goals. We lead by example, creating shared value that meets social needs while driving business innovation.

This statement forms a key part of our UK & Ireland sustainability strategy: to lead the way as a socially responsible business. We are clear that making the future work for everyone must include our colleagues, candidates, clients and the wider community.

We are members of the Recruitment and Employment Confederation (REC), the Association of Professional Staffing Companies (APSCo) and the Association of Labour Providers. In 2022, we achieved a silver sustainability rating for Ecovadis. We work closely with our industry bodies to improve sector-wide standards and advocate improved laws and policies that fit our purpose of “Making the Future Work for Everyone”.

We are committed to not causing nor contributing to adverse human and/or labour rights. As a business, we are committed to finding and solving modern slavery risks and issues within our organisation and supply chains. This is our seventh statement, and we are dedicated to strengthening our work in this area year on year.

Our Global Commitment to Human and Labour Rights

As a world-leading talent solutions and advisory company and one of the largest employers worldwide, our success begins and ends with our people. We are a business of people for people, touching the working lives of hundreds of thousands of individuals every day. We believe that respecting internationally recognised human and labour rights is not only the right thing to do, but that investing in our talent and their rights is the best way to do business. It is one of the many ways we bring our purpose and our values to life, and a critical contribution we can make towards achieving the United Nations Sustainable Development Agenda.

We recognise our responsibility to ensure respect for human, and particularly labour rights, within our sphere of influence. This imperative carries across our value chain and wherever we do business – and our ability to positively impact human and labour rights. We continuously strive to embed fair and ethical recruitment practices and respect workers' rights in our daily business operations across the world.

We are committed to protecting workers and addressing human or labour rights abuses or violations as we become aware of them, to the best of our abilities. It is in our inherent interest to ensure the Adecco Group is neither complicit nor implicated in any human and/or labour rights abuses. This duty of care is a fundamental part of how we operate.

As a leader in the world of work, we want to set an example in creating a responsible, positive and inspiring environment to attract, retain and empower our people around the globe.

We base our commitment to workers' rights on the internationally recognised human rights Principles as defined by:

- The Universal Declaration of Human Rights (“UDHR”); and
- The core labour conventions of the International Labour Organisation (“ILO”), including the ILO Declaration on Fundamental Principles and Rights at Work and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

As a talent solutions and advisory company, we respect all internationally recognised Human Rights and particularly focus on:

- Ensuring just and favourable conditions of work and associated rights;
- Equality and non-discrimination;
- Physical and mental health;
- The right to privacy.

The Adecco Group is committed to not causing nor contributing to adverse human and/or labour rights, including child labour, forced and bonded labour, modern slavery and human trafficking across all our operations and business dealings and relationships. We also work to find and solve modern slavery risks and issues within our business and supply chains. This involves complying with national laws while respecting these international rights principles.

Our business also embraces other recognised international general and sector-specific standards, such as:

- The United Nations (UN) Global Compact. In 2003, the Adecco Group became the first organisation in our industry to sign the pact on a global basis;
- The World Employment Confederation Code of Conduct, which sets the gold standard for the employment and recruitment industry;
- ILO Convention 181 on Private Employment Agencies;
- The UN Guiding Principles for Business and Human Rights and the corresponding EU Guide on Business and Human Rights for the Employment and Recruitment Sector; and
- The OECD Guidelines for Multinational Companies.

At the Adecco Group, we have numerous commitments, policies, procedures and corresponding training that translate these standards into our daily business. At a global level, this includes our newly relaunched [Code of Conduct](#), [Human Rights Policy](#), [EDI Statement](#), relevant HR policies, supplier code of conduct and data protection policy.

Human rights form an integral part of our integrity and compliance, risk management and audit frameworks. Given our shared responsibilities and objectives in this area, we increasingly seek to collaborate with stakeholders on human rights-related questions to change realities and advance respect for human rights. In turn, we demand equally high standards from our suppliers.

In 2022, we embarked on a comprehensive journey to strengthen our existing third-party risk management (TPRM) framework. These efforts helped the Group to strategically and consistently assess and manage risks associated with third parties that could have significant adverse environmental or social impacts and may expose the Group to financial and/or reputation risks. An in-depth, risk-based analysis of our existing supplier portfolio developed our enhanced TPRM operating model, methodology, governance structures and future process landscape. The roll-out will continue across 2023/2024, complemented by a revised supplier code of conduct that establishes the fundamental principles we expect our suppliers and related third parties to adhere to.

As a global leader in the world of work, we are vocal advocates for a new social contract. We highlight the need for social security systems that match how people work in the 21st century, guaranteeing appropriate protections for all workers – permanent, temporary or freelance. We also lead the debate on how companies and governments should rethink workforce investment and account for human capital, to incentivise organisations to address skills shortages and employability challenges. Given Covid-19's continuing impact on people's working lives and the significance of recent societal movements for the world of work, we believe these priorities are more critical than ever.

For more information on our global approach to human and labour rights, please see the [Adecco Group 2022 Annual Report](#) and [our website](#).



Adecco Group UK & Ireland Commitment and Approach

During 2022, we continued to develop our outcome-focused programmes to solidify the UK & Ireland's commitment to driving social impact performance and systemic change. We accelerate progress through three societal outreach programmes, collectively called "Creating Brighter Futures". These programmes are:

- Think Bright for 11-15 year olds – spreading awareness about skills and career pathways in partnership with schools, government and social enterprise;
- Plan Bright for 16+ years – influencing future talent pools by empowering youth and connecting enterprise and education; and
- Shine Bright – focused on supporting those who are Not in Education, Employment or Training (NEET) to improve the employability of people with under-realised working potential.

We 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") implements and enforces effective systems and controls to eliminate slavery and human trafficking from our business and supply chains. Every colleague 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 staff to report wrongdoing (including 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. These include the [Adecco Compliance and Ethics \("ACE"\) website](#) and the [Adecco Compliance and Ethics Line](#).

Both internet and telephone reporting are available 24 hours a day, 7 days a week, with representatives who can consult in almost any language. The Adecco Group accepts anonymous reports, consistent with applicable law. We fully investigate every report and follow up with remedial action and escalation to our Executive Leadership Team if appropriate.

Maintaining the highest standards of ethical conduct and ensuring we meet our legal obligations are central to the Adecco Group's sustainable success:

- All policies are available to staff at all times via our internal intranet system.
- 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 any person for raising a concern.
- Allegations of retaliation will be investigated, and appropriate action will be taken.

In the UK, modern slavery concerns can also be reported directly to the government's Modern Slavery Helpline on 0800 0121 700. In the Republic of Ireland, reports can be made to the Migrant Right Centre Ireland on 01 889 7570.

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. In the context of human and labour rights, 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 UDHR, and the fundamental human rights and labour rights as articulated by the ILO;
- Treat and reward employees equally based on the characteristics of their work and the intensity of their effort;
- Provide, while considering 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.

We ensure our supply chain shares our values and makes reciprocal commitments to manage modern slavery risks and provide appropriate training for their own staff. During 2022, we developed a risk matrix of industries and supplier types that are most at risk of modern slavery, and mandated that new suppliers within those areas are evaluated against the framework before proceeding.



Training

In our previous statements, we have outlined our steps to increase internal awareness of identifying and responding to modern slavery and human trafficking incidents. These included updating our in-house guidance and providing details for the government's Modern Slavery Helpline.

To further improve our capabilities in this area, key modern slavery stakeholders have undertaken training with Stronger Together, a not-for-profit organisation that helps businesses tackle workplace exploitation. We subsequently created bespoke in-house training and rolled it out to all front-line sales consultants in 2020, in conjunction with raising awareness of Anti-Slavery Day. The training was deployed again in 2022 and is now mandatory for new and existing colleagues across the Adecco Group UK & Ireland businesses. It is also available for clients and suppliers.

Throughout 2022, we continued to promote internal awareness, with a specific focus on our branch offices and onsite teams, as well as all-colleague communications around Anti-Slavery Day.

Client Awareness

We are committed to working closely with our clients to ensure respect for human rights across the full value chain. This involves talking openly to our customers about our shared responsibilities and collaborating to identify and combat risks. We encourage 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 provide workers for these clients, we have enhanced our contractual requirements. The success of our in-house training has enhanced awareness of modern slavery issues with our clients, and we are pleased to be able to share our bespoke in-house training with clients upon request.



Risk Assessment and Due Diligence Processes

The risk of slavery and human trafficking within our organisation is mitigated by our comprehensive policies and staff awareness. Our most significant modern slavery risks lie within our supply chain, so we have implemented systems to:

- Identify and assess potential risk areas in our supply chains;
- Audit prospective suppliers based on their risk level;
- Mitigate supply chain slavery and human trafficking risks by asking our suppliers key questions;
- Carry out regular record analysis as standard for our colleagues;
- In higher-risk areas for candidates, identify red flags such as multiple workers having the same contact telephone numbers, address or bank details;
- Ensure concerns identified through worker record analysis are reported to the modern slavery committee and investigated; and
- Protect whistleblowers by providing a confidential helpline.

In 2022, Adecco UK Limited continued its membership of the Association of Labour Providers (ALP), an organisation that promotes responsible recruitment and supports members to make labour provision a model of sustainable good practice. We continue to work closely with ALP and Stronger Together to build robust processes that effectively prevent and detect modern slavery concerns.



Our Effectiveness in Combating Slavery and Human Trafficking

In the UK and Ireland, our Integrity and Compliance, HR and Legal teams ensure we operate in line with law, policy and process. We regularly review our policies and procedures to achieve ongoing compliance.

As part of our commitment to continuous improvement, we maintain a committee of colleagues from our Integrity and Compliance, Corporate Governance, HR and Procurement teams. They meet quarterly to review our priorities and agree best practice for combatting modern slavery across our UK & Ireland businesses.

During 2022, this committee continued to report to our UK & Ireland General Counsel – the designated lead for tackling modern slavery. The committee structure and board sponsor improve our internal governance and Executive Leadership Team oversight of this important topic, as part of our wider sustainability strategy.

For more information on our corporate governance and ESG priorities in the UK & Ireland, please view our Corporate Governance Report on our brand websites.

Further Steps

As an organisation, we are committed to strengthening our modern slavery and human trafficking prevention efforts year on year. Following an effectiveness review of our actions to date, we intend to achieve the following in 2023:

- Promote internal awareness, particularly within our branch offices and onsite teams, through a dedicated team of subject matter experts in HR, procurement and compliance, with a specific focus on creating “champions” within the business.
- Further develop our training course to increase awareness of modern slavery and the importance of training with our colleagues, clients and suppliers.
- Adopt the Adecco Group’s new global third-party risk management policies and tools in the UK and Ireland.

This statement was approved by the Adecco Group UK and Ireland Leadership Team on 16th May 2023 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



JC Townend, President UK&I, The Adecco Group