



# 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 its business and supply chains during the year ending 31 December 2021. This statement covers the following legal entities across our Adecco Workforce Solutions, LHH and Modis business units:**

- Adecco UK Limited
- Adecco Ireland Limited
- Adecco Working Ventures Limited
- Ajilon (UK) Limited
- Badenoch & Clark Limited
- Lee Hecht Harrison Penna Limited
- Modis Europe Limited trading as “Modis”
- Modis International Limited trading as “Modis”
- Office Angels Limited
- Penna Plc
- Pontoon Europe Limited
- Roevin Management Services Limited trading as Spring Engineering
- Spring Technology Staffing Services Limited
- Stafford Long and Partners Limited

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## Our Business:

We have a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains. This is our sixth statement and we are committed to strengthening our work in this area year on year.

The Adecco Group is the world’s leading talent solutions and advisory company driven by a powerful global purpose – to make the future work for everyone. Our 360° solutions offering enables sustainable and lifelong employability for individuals and empowers 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 our 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. We work closely with our industry bodies to improve industry-wide standards and advocate improved laws and policies that fit with our purpose of “Making the Future Work for Everyone”.

## 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 enabling sustainable and lifelong employability and 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 respecting and promoting human rights. As a talent solutions provider, we have a double responsibility when it comes to human rights, especially labour rights; both towards our own colleagues, and also towards the individuals 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.

### **At the Adecco Group, we base our commitment to workers' rights on the internationally recognised Human Rights principles as defined by:**

- The Universal Declaration of Human Rights; 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.

We are committed to respecting all internationally recognised Human Rights: as a talent solutions and advisory company we particularly focus on; ensuring just and favourable conditions of work and associated rights; equality and non-discrimination; physical and mental health; and the right to privacy. We have a zero-tolerance approach to child labour, forced and bonded labour, modern slavery and human trafficking across all our operations and business dealings and relationships. We also comply with national laws while respecting these international rights principles.

### **We also embrace other recognised international general and sector-specific standards such as:**

- The United Nations (UN) Global Compact; the Adecco Group globally was the first organisation in our industry to sign this as early as 2003;
- 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. This includes for example, our Code of Conduct and Human and Labour Rights Guidelines (which are both currently being revised), our D&I Statement, relevant HR policies, our supplier code of conduct, data protection policy, and our principles for the ethical use of Artificial Intelligence (AI). Human rights 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. In turn we demand these high standards from our suppliers.

As a leader in the world of work, globally 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. Given the impact that Covid-19 had and continues to have on people’s working lives, and the significance of recent societal movements for the world of work, we believe these priorities are even more pivotal than before.

More locally, during 2021 we continued to develop our outcome-focused programmes to solidify the UK & Ireland’s commitment to driving social impact performance and systemic change through three societal outreach programmes, collectively referred to as “Creating Brighter Futures”: These programmes are (i) Think Bright for 11-15 year olds – spreading awareness about skills and career pathways in partnership with schools, government and social enterprise; (ii) Plan Bright for 16+ years – influencing future talent pools by empowering youth and connecting enterprise and education; (iii) Shine Bright – focused on supporting those who are Not in Education Employment or Training (NEET) to improve the employability of all whose working potential is currently under-realised.

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, with representatives who can consult in almost any language. The Adecco Group will accept anonymous reports, consistent with applicable law. 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. Maintaining the highest standards of ethical conduct and ensuring we meet our legal obligations are central to the Adecco Group’s sustainable success.

Alternatively, for more information or guidance, or to report a case of modern slavery, in the UK the government’s Modern Slavery Helpline may be contacted directly on 0800 0121 700, or in the Republic of Ireland the Migrants Right Centre Ireland can be contacted on 01 889 7570.

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## 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.



We ensure that our supply chain shares our values and makes reciprocal commitments to manage any risk of modern slavery and ensure appropriate training of their own staff. As part of our commitment to continuous improvement, throughout 2021 we continued to retrospectively audit our suppliers who are operating in high risk areas, as well as to question any new supplier on their standards.

These audits will continue in 2022, with particular focus on enhancing our contractual requirements for those suppliers who supply candidates into our clients through second tier arrangements.



## Training

In our previous statements we have outlined the steps we have 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 in-house training was subsequently created, and this was rolled out to front line sales consultants across our business in 2020 in conjunction with raising awareness of Anti-Slavery Day. This training continued to be used throughout 2021 and is now mandatory for both new and existing colleagues across the Adecco Group UK & Ireland businesses.

## Client Awareness

We are committed to working more closely with our clients to ensure respect for human rights across the full value chain, by talking openly to our clients about this topic and 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 2022 we will continue to increase our scrutiny of those suppliers still further. The success of our in-house training has enabled us to enhance 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 the existence of our policies, and the knowledge and skill of our staff. We consider that the most significant risk of Modern Slavery 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;
- carrying out regular record analysis as standard for our colleagues, and in higher risk areas for our candidate records, to identify risk areas such as multiple workers having the same contact telephone numbers, address or bank details;
- ensuring that any concerns identified through worker record analysis are reported to the modern slavery committee and investigated;
- protecting whistleblowers by providing a confidential helpline.

In 2021 Adecco UK Limited joined the Association of Labour Providers (ALP), an organisation which promotes responsible recruitment and supports members to ensure that labour provision is recognised as a model of sustainable good practice. We continue to work closely with both ALP and Stronger Together to ensure the quality and focus of our processes to both prevent and detect any modern slavery concerns.



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## Our Effectiveness in Combating Slavery and Human Trafficking

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

As part of our commitment to continuous improvement, we maintain a committee of colleagues from our compliance, corporate governance, HR and procurement teams who meet quarterly to review our priorities and agree best practice for combatting modern slavery across our UK&Ireland businesses.

The modern slavery prevention committee reports to our UK & Ireland General Counsel who has designated formal responsibility for tackling modern slavery. The committee structure and board sponsor improve our internal governance and board oversight of this important topic, as part of our wider sustainability strategy.



## 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 to date, in 2022 we intend to:

1. Continue to promote internal awareness of this important human rights issue, particularly within our branches and onsite teams, through a dedicated team of subject matter experts in HR, procurement and compliance, with a specific focus on communications around Anti-Slavery Day;
2. Use our bespoke training course to continue to promote awareness of modern slavery and the importance of training with both our clients and suppliers;
3. Continue to audit our suppliers with particular focus on those suppliers who supply candidates into our clients through second tier arrangements.

This statement was approved by the board of directors on 8th March 2022 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



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**Gavin Tagg**  
General Counsel, Director