

OVERVIEW

This statement is published under section 54(1) of the Modern Slavery Act 2015. It explains the steps taken by the Adecco Group UK and Ireland (“we”, “us” or “our”) during the year ended 31 December 2025 to prevent modern slavery and human trafficking in our business and supply chains. It focuses on six areas: our Group structure and supply chains; our global and local policies; our due diligence; risk assessment and management; how we measure effectiveness; and training. It covers the following legal entities across our Adecco, LHH and Akkodis business units:

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

Our Group structure and supply chains

The Adecco Group’s purpose is to *make the future work for everyone*. We connect people with work, support their development and help businesses access the talent they need. Our UK and Ireland operations are part of a global talent solutions group and operate through the legal entities listed above, across our Adecco, LHH, and Akkodis businesses.

Adecco

Adecco is a global leader in workforce solutions. Adecco empowers individuals and organisations to achieve their potential together by connecting the right talent with the right role.

AKKODIS

Akkodis is a leading global digital engineering consulting business that empowers organisations to accelerate and innovate. Operating where IT and engineering converge, we bring deep domain knowledge in AI, data analytics, and cloud computing.

LHH

LHH empowers professionals and organisations to achieve bold ambitions and secure lasting impact through unique advisory services and talent solutions. We believe the future of work lies at the intersection of human care and innovation.

This statement supports our UK and Ireland sustainability strategy and our aim to lead as a socially responsible business. Our commitment applies to clients, candidates, associates, colleagues, suppliers and the communities in which we operate.

We are members of the Recruitment and Employment Confederation (REC), the Confederation of British Industry (CBI) and the Association of Labour Providers (ALP). We also hold an EcoVadis sustainability commitment badge and are SEDEX members. Through these memberships, we work with industry bodies to improve sector standards and support laws and policies aligned with our purpose.

This is our eighth modern slavery statement. We remain committed to identifying, preventing and addressing modern slavery risks in our business and supply chains, and to strengthening our approach each year.

Our global policies in relation to slavery and human trafficking

As a global talent solutions business and major employer, our work affects candidates, associates and colleagues across many industries and countries. Respect for human rights is therefore a core operational responsibility. It means that recruitment must be fair and transparent, work must be freely chosen and safe, and people must be treated with dignity and without discrimination.

Our Code of Conduct and Group Human and Labour Rights Policy set our global minimum standards across the Group and our value chain. They are supported by our Third-Party Code of Conduct and global and country-level policies covering employment terms, health and safety, non-discrimination, workplace conduct, modern slavery, data security and privacy, business acceptance, supplier due diligence, integrity and compliance, report management and investigations.

Globally, we also apply recognised international standards, including the UN Global Compact, the World Employment Confederation (WEC) Code of Conduct, ILO Convention 181 on Private Employment Agencies, the UN Guiding Principles on Business and Human Rights, the EU Guide on Business and Human Rights for the Employment and Recruitment Sector, and the OECD Guidelines for Multinational Companies.

These standards are embedded in our global [Code of Conduct](#), [Human & Labour Rights Policy](#), [EDI Statement](#), [Third Party Code of Conduct](#), [Data Protection Policy](#), and relevant HR policies.

Our main human and labour rights focus areas are:

- The right to work and to choose employment freely;
- The right to just and favourable working conditions;
- The right to equality and non-discrimination;
- The right to health and well-being at work;
- The right to privacy.

We seek to prevent and mitigate adverse human and labour rights impacts that we cause or contribute to. We do not tolerate modern slavery in any form, including forced, bonded, compulsory, prison or indentured labour, or human trafficking. We prohibit practices that could lead to coercion or exploitation, and we manage human rights through our compliance, risk management and control frameworks.

Further information is available in the [Adecco Group 2025 Annual Report](#) and on [our website](#).

UK and Ireland commitment and approach

In 2025, we continued to support fair working conditions and respect for human rights across the areas where we can have an impact.

Local policies and implementation

Our Anti-slavery and Human Trafficking Policy ("Anti-Slavery Policy") sets out how we seek to prevent slavery and human trafficking in our operations and supply chains. Colleagues must follow the policy, raise concerns promptly and use the appropriate reporting channels.

Our Whistleblowing Policy encourages colleagues to report wrongdoing, including breaches of the Anti-Slavery Policy. Reports can be made through the [Adecco Compliance and Ethics \("ACE"\) website](#) and the 24/7 [ACE hotline](#), which is available in multiple languages. Anonymous reports are accepted. All cases are investigated and, where appropriate, escalated to the Executive Leadership Team.

Key local policy points are:

- Policies are available to all staff on the intranet at all times.
- Colleagues are encouraged to seek advice, raise concerns and report misconduct.
- Reports of misconduct are protected from retaliation.
- Allegations of retaliation are taken seriously, investigated and addressed.

In the UK, concerns can also be reported to the Modern Slavery Helpline (0800 0121 700). In Ireland, concerns can be reported to the Migrant Rights Centre Ireland (01 889 7570).

Our supply chains and supplier standards

We require suppliers to meet our ethical standards. For human and labour rights, suppliers must, without limitation:

- Not hold any person in slavery or servitude or require forced or compulsory labour;
- Not arrange or facilitate the trafficking of any person;
- Not source goods or services from companies that use involuntary labour or participate in human trafficking;
- Act consistently with the UN Global Compact and other international human rights and labour standards, including the International Bill of Human Rights and the core conventions of the International Labour Organisation;
- Ensure fair and equal treatment and pay, based on the nature and demands of the work;
- Provide safe, hygienic and healthy working conditions, taking account of sector-specific risks;
- Pay at least the applicable national minimum wage;
- Comply with applicable national and regional laws and regulations at all times.

We expect suppliers in our supply chain to align with our values, manage modern slavery risks and provide appropriate training to their own staff. In 2025, we strengthened vetting and

onboarding procedures so that potential new suppliers are screened for modern slavery risk before commitments are made.

In 2025, we also enhanced our third-party risk management framework and revised our Third-Party Code of Conduct. This work will continue in 2026.

Training on modern slavery and trafficking

We have strengthened awareness of modern slavery and human trafficking by updating our guidance and including the Government's Modern Slavery Helpline in our policies and procedures.

Key stakeholders have completed training with Stronger Together, which informed the development of our bespoke in-house programme for front-line sales consultants. First introduced in 2020, the programme was updated in 2023 to strengthen its inclusivity. The training is mandatory for all colleagues and is available to clients and suppliers.

In 2024, we introduced **Anti-Slavery Champions**, trained colleagues who help raise awareness of modern slavery and human trafficking risks across branch offices, onsite teams and enabling functions. Their responsibilities include:

- **Educating colleagues, clients and suppliers** about the signs of modern slavery and how to respond.
- **Promoting good practice** to help prevent exploitation at work.
- **Supporting compliance** with relevant laws, regulations and internal policies.

Anti-Slavery Champions help build a culture of vigilance and responsibility so we can identify risks and support affected individuals.

Client awareness and collaboration

We work with clients to uphold human rights across the value chain. This includes open dialogue about shared responsibilities and practical steps to identify and reduce risk. We encourage clients in higher-risk sectors to display Stronger Together posters so workers can recognise and report modern slavery risks. Where second-tier suppliers provide workers indirectly to clients, we strengthen contractual requirements to reinforce these standards. We also make our tailored modern slavery training available to clients on request.

Due diligence processes

We use due diligence to identify and manage modern slavery risks, particularly in our supply chain. Our processes include:

- Identifying and assessing potential risk areas across our supply chains;
- Auditing prospective suppliers based on risk level;
- Requiring suppliers to answer targeted due diligence questions through our Third Party Risk Management process;
- Analysing colleague records as part of standard controls;
- In higher-risk areas, checking for warning signs such as multiple workers sharing the same contact telephone number, address or bank details;

- Reporting concerns identified through worker record analysis to the Modern Slavery Committee for investigation;
- Safeguarding whistleblowers through access to confidential reporting channels.

In 2025, Adecco UK Limited continued its membership of the Association of Labour Providers (ALP), which promotes responsible recruitment and supports sustainable labour provision. We continue to work with ALP and Stronger Together to improve processes for preventing and detecting modern slavery concerns.

Risk assessment and management

Our assessment is that the greatest modern slavery risk sits in the supply chain, particularly where labour is provided through third parties or in higher-risk operational areas. We manage this risk through supplier screening, risk-based audits, targeted due diligence questions, worker record checks, escalation to the Modern Slavery Committee and confidential reporting routes.

Key performance indicators to measure effectiveness

In the UK and Ireland, our Integrity and Compliance, HR, and Legal teams work together to keep our approach under review and ensure we comply with applicable laws, policies, and procedures.

In 2025, we strengthened internal control standards for associate management by adding clearer minimum requirements on modern slavery. We also broadened colleague representation in the working group across Adecco, LHH, Akkodis, and Pontoon, as well as the Integrity and Compliance, HR, Procurement, and Supply Chain teams.

We measure the effectiveness of our steps by tracking the following indicators:

- Completion of mandatory modern slavery training;
- Supplier screenings and due diligence reviews completed;
- Worker record checks completed and warning signs escalated for investigation;
- Reports made through ACE and other reporting channels, and the outcome of investigations;
- Modern Slavery Committee and ERG meetings, actions and follow-up;
- Progress against the further steps set out in this statement.

During 2025, the ERG reported to the UK and Ireland Head of Quality Assurance & Improvement, the designated lead for tackling modern slavery. That role reports to the UK and Ireland Head of Legal & Compliance and the Executive Leadership Team, strengthening oversight as part of our wider ESG strategy.

The ERG meets at least bi-monthly to review priorities, assess progress against these indicators, and agree on good practice for tackling modern slavery across our UK and Ireland operations.

Further information on our corporate governance and ESG priorities in the UK and Ireland is available in our Corporate Governance Report on our brand websites.

Further steps

Following our review of effectiveness, we intend to take the following steps in 2026:

- Continue to promote awareness across branch offices, onsite teams, supply chains and clients, using subject matter experts in Operations, HR, Procurement, Supply Chain and Compliance and embedding key messages in induction and onboarding materials.
- Enhance our training to strengthen awareness and support for clients and second-tier suppliers.
- Further develop the Adecco Group's global third-party risk management policies and tools across the UK and Ireland, with active involvement from key internal and external stakeholders.

Approval

This statement was approved by the Adecco Group UK and Ireland Leadership Team on 24 June 2026 and is made under section 54(1) of the Modern Slavery Act 2015.



JC Townend

Country President, Adecco Group UK & Ireland