

**THE ADECCO GROUP**

Adecco AKKODIS LHH

# Modern Slavery Statement

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## OVERVIEW

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the Adecco Group UK and Ireland (“we” or “our”) to prevent modern slavery and human trafficking in our business and supply chains during the year ending 31 December 2024. This statement 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
- Pontoon Europe Limited
- Roevin Management Services Limited
- Spring Technology Staffing Services Limited

## Our Business

The purpose of the Adecco Group is to “Make the Future Work for Everyone”, helping to create a future where everyone has the opportunity to work and succeed. As one of the world’s largest employers, the company finds, develops and connects people with jobs that match their skills while supporting businesses in finding the right talent. The company is well positioned to navigate the impact of megatrends and technological change, ensuring that people are prepared for the evolving job market. By doing so, the Adecco Group aims to enrich people’s lives and contribute to a more inclusive and sustainable workforce for the future.

## Our Global Business Units

**Adecco**

Adecco is a global leader in workforce solutions, offering flexible placement, permanent placement, outsourcing and managed services across all sectors.

**AKKODIS**

Akkodis powers the digital transformation and accelerates innovation with cross-industry technology and digital engineering consulting, talent services and skilling.

**LHH**

LHH helps future-proof organisations and careers by building the right capabilities and enabling workforce transformation.

This statement forms a key part of our UK and 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 clients and candidates, tech experts and associates, colleagues, and the wider community.

We are members of the Recruitment and Employment Confederation (REC), and the Association of Labour Providers. We hold a bronze medal sustainability rating for EcoVadis and are SEDEX members. We work closely with our industry bodies to improve sector-wide standards and advocate improved laws and policies that fit our purpose.

As a business, we are committed to finding and solving modern slavery risks and issues within our organisation and supply chains. This is our eighth 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 leading talent solutions company, our success is rooted in our people. We touch the lives of hundreds of thousands of people daily, believing that respecting human and labour rights is essential for business success and aligns with the UN Sustainable Development Agenda.

We strive to positively impact human and labour rights across our value chain, embedding fair recruitment practices and respecting workers' rights globally. We are committed to protecting workers and addressing rights abuses, ensuring we are not complicit in any violations.

Our commitment is based on internationally recognised human rights principles, as defined by: the International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, the International Covenant of Civil and Political Rights and the International Covenant of Economic, Social and Cultural rights and core International Labour Organisation ('ILO') conventions.

Our business also embraces other recognised international general and sector-specific standards such as: The United Nations (UN) Global Compact; 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.

Our policies, such as the global [Code of Conduct](#), [Human & Labour Rights Policy](#), [EDI Statement](#), [Third Party Code of Conduct](#), [Data Protection Policy](#) and relevant HR policies translate these standards into daily operations.

As a talent company we particularly focus on:

- Right to work and free choice of employment;
- Right to just and favorable conditions of work and associated rights;
- Right to equality and non-discrimination;
- Right to health and wellbeing at work;
- Right to privacy.

We aim to prevent and mitigate adverse human and labour rights impacts, and oppose modern slavery and human trafficking. Human rights are integral to our compliance and risk management frameworks, and we collaborate with stakeholders to advance respect for human rights.

For more information, see the [Adecco Group 2024 Annual Report](#) and [our website](#)

## Adecco Group UK & Ireland Commitment and Approach

During 2024, we continued to show our commitment to ensuring fair working conditions and respect for human rights within our sphere of influence, striving to be at the forefront of creating brighter futures for all.

## Local Policies and Their Implementation

Our Anti-slavery and Human Trafficking Policy ("Anti-Slavery Policy") aims to eliminate slavery and human trafficking from our business and supply chains. All colleagues must comply with the policy, raise concerns, and use reporting channels promptly.

We also have a Whistleblowing Policy encouraging staff to report wrongdoing, including breaches of the Anti-Slavery Policy, through various tools like the [Adecco Compliance and](#)

[Ethics \("ACE"\) website](#) and [ACE hotline](#), available 24/7 in multiple languages. Anonymous reports are accepted and fully investigated, with actions escalated to the Executive Leadership Team if needed.

Key points:

- Policies are accessible to all staff at all times via the intranet.
- Any colleague who, in good faith, seeks advice, raises a concern or reports misconduct is doing the right thing.
- Reporting misconduct is encouraged and protected from retaliation.
- Retaliation allegations are investigated and addressed.

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

## Supply Chain Responsibility

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 United Nations Global Compact on human rights, labour, the environment and anti-corruption, as well as other international norms and standards in this field, including but not limited to the International Bill of Human Rights and the core labour conventions of the International Labour Organization (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 both manage modern slavery risks and provide appropriate training for their own staff. During 2024, we improved our vetting and onboarding procedures, to ensure potential new suppliers are screened, including for Modern Slavery, before any commitments are made.

In 2024, we enhanced our third-party risk management framework and revised our third-party code of conduct to manage risks associated with third parties. These efforts will continue through 2025.

## Training

We have taken steps to increase awareness of modern slavery and human trafficking, including updating our guidance and providing the contact details for the government's Modern Slavery Helpline in our policies and procedures.

Key modern slavery stakeholders have received training from Stronger Together, leading to the creation of bespoke in-house training for all front-line sales consultants in 2020, which was reviewed in 2023 to be more inclusive. This training is mandatory for all colleagues and available to clients and suppliers. In 2024, we created the role of Anti-Slavery Champions.

**Our Anti-Slavery Champions** are colleagues who are specifically trained and are committed to lead efforts in raising awareness of modern slavery and human trafficking risks in our branch offices and onsite teams. Their roles typically include:

- **Educating colleagues, clients and suppliers** about the signs of modern slavery and how to respond.
- **Promoting best practices** to prevent exploitation within the workplace.
- **Ensuring compliance** with relevant laws and regulations.

These champions play a crucial role in fostering a culture of vigilance and responsibility, helping to ensure that the Adecco Group actively combats modern slavery and supports affected individuals.

## Client Awareness

We are dedicated to partnering with our clients to uphold human rights throughout the entire value chain. This commitment includes engaging in open discussions with our customers about our mutual responsibilities and working together to identify and mitigate risks. We encourage clients in high-risk sectors to display Stronger Together posters, thereby increasing awareness of this issue for all workers at their locations. When we use second-tier suppliers to indirectly provide workers for these clients, we have strengthened our contractual requirements. Our in-house training has successfully raised awareness of modern slavery issues among our clients, and we are pleased to offer this bespoke training to 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 2024, 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 have strengthened our Employee Resource Group ("ERG") over the last few years by introducing representatives from each of our business units – Adecco, LHH, Akkodis and Pontoon to our existing network of colleagues from our Integrity and Compliance, Corporate Governance, HR, Procurement and Supply Chain teams. We also introduced the Anti-Slavery Champion role to reinforce Modern Slavery best practice throughout the wider Adecco Group team.

During 2024, the ERG reported to our UK and Ireland Head of Quality Assurance & Improvement – the designated lead for tackling modern slavery, who reports on progress to the Head of Legal & Compliance and ESG and the Executive Leadership Team. The revised governance structure improves our internal governance and Executive Leadership Team oversight of this important topic, as part of our wider ESG strategy.

The ERG meets at least every other month to review our priorities and agree best practice for combatting modern slavery across our UK and Ireland businesses.

For more information on our corporate governance and ESG priorities in the UK and 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 2025:

- Continue to promote internal and external awareness, particularly within our branch offices, onsite teams, supply chain and clients and through our dedicated subject matter experts in Operations, HR, Procurement, Supply Chain and Compliance
- Enhance our training course to increase the awareness and support around modern slavery we provide to our Second Tier Suppliers.

- Further develop the Adecco Group's new global third-party risk management policies and tools in the UK and Ireland to include our Second Tier Suppliers.

### Approval

This statement was approved by the Adecco Group UK and Ireland Leadership Team on 2<sup>nd</sup> June 2025 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



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