



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 its business and supply chains during the year ending 31 December 2020, and covers the following legal entities:

- Adecco UK Limited
- Ajilon (UK) Limited
- Badenoch & Clark Limited
- Modis Europe Limited trading as “Modis”
- 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
- Stafford Long and Partners Limited

Our Business:

We have a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains. This is our fifth statement and we are 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 workforces. 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 in order to fulfil our local UK & Ireland purpose of Creating Brighter Futures for all of our colleagues, candidates, clients and our wider community.

We are members of the Recruitment and Employment Confederation (REC), and work closely with the REC to improve industry-wide standards and advocate improved laws and policies that fit with our UK&I purpose of “Creating Brighter Futures”, and to add our voice to Government in the role that UK and Ireland businesses can play in supporting a post-pandemic recovery.

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 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 relevant to our operations. 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, Human and Labour Rights Guidelines, 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 in 2020 (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 2020 we developed a set of outcome-focused programmes to solidify the UK & Ireland’s commitment to supporting our Communities through three key channels: (i) Access to Work – to improve the employability of those whose working potential is under realised; (ii) Access to Opportunity – to influence future talent pools by empowering youth, and connecting enterprise and education; and (iii) Inclusive Futures – committing to equality across the Adecco Group in the focus areas of education and awareness, culture and mindset, and reporting and policy.

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. 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, 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.

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, we committed in our previous statement to carrying out a retrospective audit of any of our suppliers who are operating in high risk areas.

To further this aim, we have carried out an initial due diligence review on our highest risk suppliers by spend. In addition, we have undertaken an exercise to categorise our suppliers according to the combined risk factors of both the industry they operate in, as well as our level of spend, and we will be further expanding our audits throughout 2021.



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. In addition, this training is now mandatory for all new colleagues joining 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. 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 2021 we will seek 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 now share our bespoke in-house training with clients upon request.

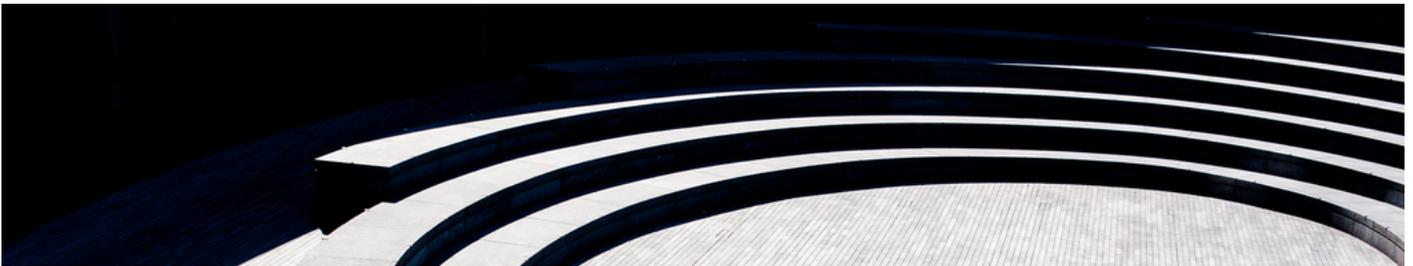


Risk Assessment and Due Diligence Processes

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 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 whistleblowers by providing a confidential helpline.

In 2020 we committed to 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. No concerns were highlighted from our initial investigations in this area, but we commit to establishing these checks as part of a regular process moving forward.



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 our UK & Ireland General Counsel was designated formal responsibility for tackling Modern Slavery to 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, in 2021 we intend to:

1. Continue to provide mandatory training to all new staff, with at least one day per year in which we commit to raising awareness of this important topic throughout our whole business;
2. Progress our dialogue with our clients by offering support, information and training;
3. Conduct regular analysis of our workers' records to ensure risk areas such as multiple workers having the same contact telephone numbers, address or bank details are identified and investigated;
4. Continue our audit of our suppliers who are operating in high risk areas.

This statement was approved by the board of directors on 26th March 2021 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



Gavin Tagg
General Counsel, Director