

Odgers Berndtson – Modern Slavery Statement

Introduction

Odgers Berndtson is a global executive recruitment business specialising in permanent and interim positions together with leadership and assessment services operating through separately constituted legal entities. We provide services in accordance with the relevant laws of the jurisdictions in which we operate. Further information about the Odgers Berndtson global business, including information on the countries in which we operate, can be found on our website.

Odgers Berndtson is committed to the highest standards of professionalism, ethical behaviour and integrity in all that we do. As part of these standards, we are committed to opposing modern slavery in all forms. We do not tolerate it within our business and will not work with suppliers and / or clients who do not hold the same high standard.

Our commitment is outlined in our Human Rights and Modern Slavery Policy. We annually update and publish this statement in accordance with that policy. This sets out the steps we have taken and continue to take to ensure modern slavery and human trafficking do not occur within our direct operations or, in so far as practically possible within our supply chain.

Organisation Structure and Supply Chain

Our business mainly employs professionally qualified and skilled people.

Our supply chain consists of goods and services to assist us in the work we undertake. Our relationships with subcontractors, suppliers and their employees, business partners, agents and others working on their behalf (collectively "Third Parties") principally include professional services and consultancy, property, facilities management, human resources, information technology and marketing.

Our Policy on slavery and human trafficking

Our policy framework includes a range of people policies that outline our commitment to modern slavery and human trafficking risks in our business.

Relevant policies include:

- **Diversity and Inclusion Policy:** encourages all our people to value diversity and respect each person's individuality, and to ensure that no person, client or candidate receives less favorable treatment on the basis of colour, race, nationality, ethnicity, or national origins, sexuality or gender, disability, age or religion or belief.
- **Whistleblowing Policy:** offers individuals a confidential mechanism for disclosing suspicions or knowledge of possible impropriety to protect the firm, its brand, people and clients by delivering an early warning when something goes wrong.
- **Anti-bribery and Corruption Policy:** sets out the firm's rules and what is expected of all our people. We expect the same standard of conduct from suppliers in all dealings on our behalf.



These policies have been made available to all of our people.

We comply with all applicable employment law relating to employee terms and conditions, including pay, and have been accredited as a UK Living Wage Employer by the Living Wage Foundation.

The firm is committed to addressing the health and wellbeing of our people.

We provide a full Employee Assistance Programme.

We operate an Allies program and conduct an annual diversity festival.

Due Diligence

Due to the nature of our services, we have a limited supply chain. We believe our risk for violations of the Modern Slavery Act are low although we keep this under review and particularly in our limited supply chain.

The Company Secretary is the individual responsible for the compliance with the Modern Slavery Act. We monitor our compliance annually and consider any additional measures each year.

Risk Assessment and Risk Management

Odgers Berndtson assesses, addresses, and manages the risk of modern slavery pre-contract with each supplier, and on an ongoing basis during contract management and review.

Through ongoing supplier management routines, supplier engagement, and at break points such as contract renewal, the effectiveness of any steps taken to mitigate risk are re-assessed and changed or enhanced where necessary.

Key performance indicators to measure effectiveness of steps being taken

We regularly conduct internal reviews to ensure the effectiveness of our strategy and to update priorities. As mentioned with such a low level supply chain it is difficult to assess and compare supplier performance. Therefore education and training of our people is seen as the best way of raising awareness of the issue and for monitoring performance.

Reporting concerns

We have created a culture to enable our people to speak openly about concerns in relation to the way in which we operate. We also encourage feedback to both report on any incidents. Additionally, we have in place a Whistleblowing mechanism to allow individuals to bring forward matters relating to this and other issues in the business in a confidential and secure manner.

Training on modern slavery and trafficking

We train all staff in matters relating to modern slavery and encourage them to report any abuses they come across either in our business or that of our suppliers and / or clients.

The topic of modern slavery and human trafficking is integrated into our new joiner induction presentation in the UK. All of our people are required to undertake mandatory training on policies relevant to their roles and responsibilities.



Board Approval

This statement is published on behalf of OGL Holdings Limited, International Resources Group Limited and IRG Advisors LLP pursuant to Section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 30 April 2024. References to "Odgers Berndtson," "we," "us," "our" or the "firm" are to these named entities.

This statement is approved by the Board of Directors.

September 2024

