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Modern Slavery Policy

Version 2.7

December 2024

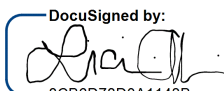
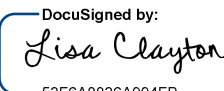
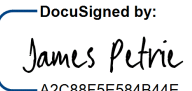
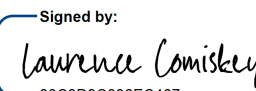


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Document Revision History

Version	Date	Author(s)	Revision Notes
1.0 – 2.9	Unknown	Unknown	
2.1	16/04/2018	S Elmore	Updated in line with Group rebrand. Policy rebranded to Standard.
2.2	16/06/2019	S Elmore	Standard image and values added
2.3	01/11/2020	L Weston	Annual Review
2.4	01/11/2021	L Clayton	Annual Review and Changed back to Policy
2.5	01/01/2023	L Clayton	Annual Review & Amendments
2.6	01/12/2023	L Clayton	Annual Review & Amendments
2.7	01/12/2024	L Clayton	Annual Review

Authorisation Approval

Role	Name	Signature	Date
Chief Executive Officer	Liam Griffin	DocuSigned by:  8CB6D78D0A1143B...	19/12/2024
Chief Operating Officer	Patrick Gallagher	DocuSigned by:  F59BB44178E3423...	19/12/2024
Data Protection Officer	Lisa Clayton	DocuSigned by:  53F6A8836A994FB...	18/12/2024
Head of Procurement	James Petrie	DocuSigned by:  A2C88F5E584B44E...	18/12/2024
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Head of HR	Laurence Comiskey	Signed by:  80C3D9C036EC467...	19/12/2024



Policy Statement

Addison Lee are committed to undertake due care and diligence to ensure that we conduct our business in accordance with our obligations under the Modern Slavery Act 2015 (MSA 2015). We recognise that in addition to a legal obligation we have an ethical responsibility to support this MSA 2015 and endeavour to ensure there are no Modern Slavery risks within our own business or our supply chains. Whilst recognising our obligations to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control individuals and organisations in our supply chains.

Policy Compliance

Addison Lee adheres to MSA 2015 laws and regulations, and compliance is compulsory since any breach may result in a criminal offence punishable by law.

All staff are required to promptly report all suspicious activities to the Risk & Compliance department.

Wilful or negligent disregard of this policy will be investigated and may be treated as a disciplinary offence.

If you do not understand the implications of this policy or how it may apply to you, seek advice from your line manager, the Risk & Compliance department or Legal department.

Policy Governance

The following table identifies who within the Group is Accountable, Responsible, Informed or Consulted about this policy.

RESPONSIBLE	Chief Executive officer, Head of Procurement
ACCOUNTABLE	Chief Executive Officer
CONSULTED	Legal, Data Protection officer
INFORMED	All employees, all 3 rd party organisations with which Addison Lee Group work with

Review and Revision

This policy will be reviewed as it is deemed appropriate, but no less frequently than annually.

Policy review will be undertaken by the Head of Procurement and the Head of Risk & Compliance & Data Protection Officer.

Purpose and Definitions

To manage the risk of serious financial loss, loss of client confidence including the Group's reputation or other serious business impact which may result from a failure to prevent slavery within the business and supply chain.

To set out the Group's responsibilities and of those working for us in observing and operating in a compliant manner.

To provide information and guidance for those working with the Group on how to identify and deal with Modern Slavery issues.

To comply with all relevant regulatory and legislation requirements including MSA 2015 and any other applicable laws.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The MSA 2015 came into force on 29 October 2015. It created additional criminal offences for those committing such acts and had the intention of seeking to establish transparency in supply chains in modern commercial organisations.

Scope

Addison Lee and group of companies are committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunity's employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

The policy applies to all employees, contractors, and other 3rd party organisations with which the Group does business with.

Consequences

Some of the Act's provisions include:



- Increasing the maximum sentence for the most serious offenders from 14 years to life
- Introducing two new civil orders to enable the courts to place restrictions on perpetrators (even before conviction)
- Adding mechanisms for seizing traffickers' assets

To avoid corporate liability, commercial organisations which meet defined criteria must prepare a slavery and human trafficking statement for each financial year which must be published on the website. The link to the statement must be visible on the home page or as part of a drop-down menu on that page. The statement shall be approved by the Board of Directors and signed by a Director.

Addison Lee Response

In accordance with section 54 (1) of the Act, the Addison Lee have prepared a slavery and human trafficking statement which will be updated for each financial year. This statement will:

- Give a description of the steps we have taken to ensure that slavery and human trafficking is not taking place in our business and supply chain
- Be approved by the Board of Directors
- Be published on the website in a clear and obvious place
- Be published within six months of the data of our financial year end

As part of our culture of good governance for good business, the Group operate to a set of core values which reflect our relationships with our principal stakeholder groups: employees, customers, shareholders, suppliers, and affiliates. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the MSA 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the MSA 2015. Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains.



To underpin our compliance with practical steps, we have and will continue to undertake the following steps:

As part of our risk management process, we have completed a risk assessment to consider any existing or future exposure. This remains an ongoing exercise.

Supply Chain

Our supplier compliance programme, enable us to record the compliance of our suppliers and ensure that we challenge our supply chain to re-assert their compliance on an annual basis and where appropriate, will review contractual terms and conditions.

We will review our purchases to understand the nature of our suppliers. These will include consultants and companies providing a wide range of goods and services to help us deliver our aims and objectives and determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas.

We will review how we engage with new suppliers to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.

We have created Supplier Operating Principles and communicated these to our suppliers and partners setting our expectations including adherence that the suppliers should comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions. We acknowledge the risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour.

The risk to modern slavery to be a low risk, due to the nature of our supply chains. We take our responsibilities seriously as demonstrated by our policies and the following measures:

- The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for the University or under its control.
- Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).
- All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited.



Recruitment and Our Staff

We have made our employees aware of the MSA 2015, of the definitions of slavery and human trafficking and ensuring they know what steps what to take should they suspect a case of slavery or human trafficking. This remains an ongoing exercise.

We have a variety of policies and procedures in place to ensure compliance with the UK employment law and periodic undertake internal audit reviews to provide assurance on the operations of these policies. Our Human Resources team manage recruitment activities with recruiting managers and only use reputable employment agencies and job boards to source candidates. We carry out appropriate background checks including Right to Work and role-appropriate Disclosure and Barring Service checks for all fixed term and permanent appointments.

Policies

Addison lee and Group maintains a suite of established formal policies including:

- Anti-Bribery and Corruption Policy,
- Equality, Diversity, and Inclusion Policy,
- Environmental Policy,
- Purchase of Goods and Services Policy
- Recruitment Policy
- Whistleblowing Policy

Responsibilities & Raising Concerns

The Board have overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all our people comply with it.

The Procurement, Affiliates, HR and Risk & Compliance departments are responsible on a day-to-day basis for implementing this policy, but any staff member who procures on behalf of the Group is required to provide assistance with reviewing risk profiles of suppliers and ensuring that procedures are implemented.

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage to your line manager or the Risk & Compliance department. The



Group encourages openness and will support anyone who raises genuine concerns in good faith under this policy.

If you are unsure whether a particular act constitutes Modern Slavery, or if you have any other queries, these may be raised with the Risk & Compliance department.

Awareness & Training

Our zero-tolerance approach to modern slavery is communicated to all suppliers, affiliates and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Training and guidance are provided to all employees utilising a specialise e-learning solution.

All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all staff's obligations under their contract of employment.

Monitoring & Review

Following its initial adoption, this Modern Slavery and Human Trafficking policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This policy will be used to inform our Statement on Slavery and Human Trafficking.

The Risk & Compliance department are responsible for holding internal audits to help assess compliance.