



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 and Ireland (“we” or “our”) to prevent modern slavery and human trafficking in our business and supply chains during the year ending 31 December 2023. This statement covers the following legal entities across our Adecco, LHH and Akkodis business units:**

- Adecco UK Limited
- Adecco Ireland Limited
- Ajilon (UK) Limited
- AKKA Developments UK Limited trading as “Akkodis”
- Badenoch & Clark Limited
- Lee Hecht Harrison Penna 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 Adecco Group is the world’s leading talent company. Our purpose is making the future work for everyone. Through our three global business units - Adecco, Akkodis and LHH - across 60 countries, we enable sustainable and lifelong employability for individuals, deliver digital and engineering solutions to power the Smart Industry transformation, and empower organisations to optimise their workforces. The Adecco Group leads by example and is committed to an inclusive culture, fostering sustainable employability, and supporting resilient economies and communities.

## 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 Smart Industry transformation globally with digital and engineering services across Consulting, Solutions, Talent and Academy.

**LHH**

LHH helps future-proof organisations and careers by building the right capabilities, delivering talent solutions 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), the Association of Professional Staffing Companies (APSCo) and the Association of Labour Providers. In 2023, we retained our silver sustainability rating for EcoVadis. We work closely with our industry bodies to improve sector-wide standards and advocate improved laws and policies that fit our purpose of “Making the Future Work for Everyone”.

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.

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## Our Global Commitment to Human and Labour Rights

As a world-leading talent solutions and advisory company and one of the largest employers worldwide, our success begins and ends with our people. We are a business of people for people, touching the working lives of hundreds of thousands of individuals every day. We believe that respecting internationally recognised human and labour rights is not only the right thing to do, but that investing in our talent and their rights is the best way to do business. It is one of the many ways we bring our purpose and our values to life, and a critical contribution we can make towards achieving the United Nations Sustainable Development Agenda.

We recognise our responsibility to positively impact human – and labour – rights, within our sphere of influence. This imperative carries across our value chain and wherever we do business. We continuously strive to embed fair and ethical recruitment practices and respect workers’ rights in our daily business operations across the world.

We are committed to protecting workers and addressing human or labour rights abuses or violations as we become aware of them, to the best of our abilities. It is in our inherent interest to ensure the Adecco Group is neither complicit nor implicated in any human and/or labour rights abuses. This duty of care is a fundamental part of how we operate.

As a leader in the world of work, we want to set an example in creating a responsible, positive and inspiring environment to attract, retain and empower our people around the globe.

We base our commitment to workers’ rights on the 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 on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural 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.

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.

At the Adecco Group, we have numerous commitments, policies, procedures and corresponding training that translate these standards into our daily business. At a global level, this includes our [Code of Conduct](#), [Human Rights Policy](#), [EDI Statement](#), relevant HR policies, [Supplier Code of Conduct](#) and Data Protection Policy.

Several key principles form the basis of our approach, as further defined in our global human and labour rights policy.

We are committed to respecting all internationally recognised Human Rights salient to our operations. As a talent company, we particularly focus on:

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

The Adecco Group is committed to not causing nor contributing to adverse human and/or labour rights impacts in areas which we can directly influence (direct impacts) and address such impacts when they occur, to the best of our abilities. Wherever feasible, we also strive to take steps to identify, prevent or mitigate adverse human and/or labour rights impacts that are linked to our operations, products, or services, or through our business relationships (indirect impacts).

We are against any form of modern slavery, including forced, bonded and/or indentured labour, child labour, and human trafficking, across any of our operations, business dealings and relationships.

Human rights form an integral part of our integrity and compliance, risk management and audit frameworks. Given our shared responsibilities and objectives in this area, we increasingly seek to collaborate with stakeholders on human rights-related questions to change realities and advance respect for human rights. In turn, we demand equally high standards from our suppliers.

In 2023, we continued our journey to introduce a more comprehensive third-party risk management (TPRM) due diligence framework. This is complemented by a revised supplier code of conduct that establishes the fundamental principles we expect our suppliers and related third parties to adhere to. These efforts help the Group to strategically and consistently assess and manage risks associated with third parties that could have significant adverse environmental or social impacts and may expose the Group to financial and/or reputation risks. An in-depth, risk-based analysis of our existing supplier portfolio developed our enhanced TPRM operating model, methodology, governance structures and future process landscape. The roll-out follows a staggered, risk-based approach appropriate to our business that will continue across 2024 and 2025.

For more information on our global approach to human and labour rights, please see the [Adecco Group 2023 Annual Report](#) and [our website](#).

## Adecco Group UK & Ireland Commitment and Approach

During 2023, 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.

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### Local Policies and Their Implementation

Our Anti-slavery and Human Trafficking Policy (“the Anti-slavery Policy”) implements and enforces effective systems and controls to eliminate slavery and human trafficking from our business and supply chains. Every colleague 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 staff to report wrongdoing (including 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. These include the [Adecco Compliance and Ethics \(“ACE”\) website](#) and the [Adecco Compliance and Ethics Line](#).

Both internet and telephone reporting are available 24 hours a day, 7 days a week, with representatives who can consult in almost any language. The Adecco Group accepts anonymous reports, consistent with applicable law. We fully investigate every report and follow up with remedial action and escalation to our Executive Leadership Team if appropriate.

Maintaining the highest standards of ethical conduct and ensuring we meet our legal obligations are central to the Adecco Group’s sustainable success:

- All policies are available to staff at all times via our internal intranet system.
- 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 any person for raising a concern.
- Allegations of retaliation will be investigated, and appropriate action will be taken.

In the UK, modern slavery concerns can also be reported directly to the government’s Modern Slavery Helpline on 0800 0121 700. In the Republic of Ireland, reports can be made to the Migrant Rights Centre Ireland on 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 UDHR, and the fundamental human rights and labour rights as articulated by the 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 2023, we improved our vetting and onboarding procedures, to ensure potential new suppliers are screened, including for Modern Slavery, before any commitments are made. We have also continued supporting the rollout of the Adecco Group's new global TPRM platform and, as a result, the UK and Ireland will be enrolled on the supply chain functionality of this platform and process during 2024.



## Training

In our previous statements, we have outlined our steps to increase internal awareness of identifying and responding to modern slavery and human trafficking incidents. These included updating our in-house guidance and providing details for the government's Modern Slavery Helpline.

To further improve our capabilities in this area, key modern slavery stakeholders have undertaken training with Stronger Together, a not-for-profit organisation that helps businesses tackle workplace exploitation. We subsequently created bespoke in-house training and rolled it out to all front-line sales consultants in 2020, in conjunction with raising awareness of Anti-Slavery Day. The training was reviewed in 2023 to be more inclusive of colleague learning styles and continues to be mandatory for new and existing colleagues across the Adecco Group UK and Ireland businesses. It is also available for clients and suppliers.

Throughout 2023, we continued to promote internal awareness, with a specific focus on our branch offices and onsite teams, as well as all-colleague communications around Anti-Slavery Day. To further enhance awareness and support we will be creating Anti-Slavery Champions across our business, an activity we will further develop throughout 2024.

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## Client Awareness

We are committed to working closely with our clients to ensure respect for human rights across the full value chain. This involves talking openly to our customers about our shared responsibilities and collaborating to identify and combat risks. We encourage 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 provide workers for these clients, we have enhanced our contractual requirements. The success of our in-house training has enhanced awareness of modern slavery issues with our clients, and we are pleased to be able to 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 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 2023, 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.

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## 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 enhanced our committee in 2023 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 and Procurement teams. We also introduced further Subject Matter Expert representatives, such as supply chain managers, to reinforce the essentiality of Modern Slavery best practise throughout the wider Adecco Group team.

During 2023, this committee reported to our UK and Ireland Head of Compliance and ESG – the designated lead for tackling modern slavery, who reports on progress to 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 committee meets at least bi-monthly 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 2024:

- Continue to promote internal awareness, particularly within our branch offices and onsite teams, through a dedicated team of subject matter experts in HR, Procurement and Compliance, with a particular focus on creating Anti-Slavery Champions within the business.
- Further develop our training course to increase the awareness and support around modern slavery we provide to our Second Tier Suppliers.
- Adopt the Adecco Group's new global third-party risk management policies and tools in the UK and Ireland.

This statement was approved by the Adecco Group UK and Ireland Leadership Team on 7<sup>th</sup> May 2024 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



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JC Townend, President TAG UK&I