

**A|M|S**

People powered partnership

**2025**

**Modern Slavery Statement**



# Compliance with the Modern Slavery Act 2015

At AMS, we recognise that we have a significant role to play in the prevention of modern slavery, human trafficking and forced labour by managing our business carefully and responsibly with a zero-tolerance approach to any form of modern slavery. We understand that by doing so, we not only protect vulnerable workers and help prevent human rights violations but also protect AMS’s reputation as a trusted partner to our customers.

AMS is fully supportive of the Modern Slavery Act and its aims and will not knowingly support or deal with any individuals, businesses or organisations involved in modern slavery or human trafficking. It is our long-term commitment to continue investing in compliance with our legal obligations.

Throughout the financial year 2024 we continued our efforts to ensure there is no modern slavery occurring within our business and our supply chain and we are pleased to report that no incidents were identified.

This statement has been published on [AMS’s website](#) and the [UK Government’s Modern Slavery Statement Registry](#) for the financial year ending 31 December 2024 in line with the requirements set out in Section 54 of the Modern Slavery Act 2015. It sets out AMS’s position on the prevention of modern slavery and human trafficking and details our policies, processes and actions undertaken to mitigate the risk of modern slavery and human trafficking occurring in our business and supply chain.

This statement covers and applies to the AMS Group of companies – collectively referred to as AMS.

This statement was approved by AMS’s Board of Directors on 29<sup>th</sup> May 2025 and signed off by Gordon Stuart, AMS’s Chief Executive Officer on 29<sup>th</sup> May 2025.

## Our structure and supply chain

We are partnering with our clients to deliver a new era of talent. Our core services include talent acquisition and orchestration, talent consulting, delivered as an outsourced model amplified by digital capability and strategic technology partnerships that span permanent and contingent workforces.

Global enterprise brands rely on AMS to understand their growth strategies and deliver results driven talent acquisition and talent consulting. Our trusted advisors apply their expertise in innovative solutions, digital understanding and responsible AI, to ensure our clients’ businesses lead the talent race.

<p><b>Talent Acquisition Solutions</b></p> <ul style="list-style-type: none"> <li>Recruitment Process Outsourcing</li> <li>Contingent Workforce Solutions</li> <li>Executive Search</li> <li>Early Careers &amp; Campus</li> <li>Skills Creation</li> <li>Total Workforce Solutions</li> </ul>	<p><b>Talent Consulting</b></p> <ul style="list-style-type: none"> <li>AI and Digital Transformation</li> <li>Employer Brand</li> <li>Diversity, Inclusion, Equity &amp; Belonging</li> <li>Skills Assessment</li> <li>Talent Technology</li> <li>Talent Acquisition Strategy</li> </ul>	<p><b>Digital Talent Solutions</b></p> <ul style="list-style-type: none"> <li>AMS One</li> <li>Strategic Partnerships</li> <li>Verified</li> </ul>
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We work across a broad portfolio of sectors including retail & hospitality, digital & technology, energy, engineering & industrial, government, banking & financial services, pharmaceutical & life sciences, and professional services. We work in a culturally rich and diverse tapestry of markets servicing 120 countries through local solutions in 53 languages.

Our solutions are delivered by 8500+ colleagues and 450 advisory consultants located across the globe who live our bold, authentic, and passionate values. Our primary offices and delivery centres are in London (Headquarters), Belfast, Krakow, Gdansk, Belgrade, Cleveland, Toronto, Monterey, Manila, Cebu, Shanghai, Wuhan and Pune.

We recognise that our supply chain is critical to our success, and we work with 3000+ suppliers worldwide. The vast majority of our suppliers are businesses located or originating from the UK, US, and EU and operating in the labour supply industry, i.e., employment agencies and employment businesses, others being technology, media, and professional service suppliers.

We also acknowledge that our supply chain is a primary risk area when it comes to modern slavery thus, we only partner with businesses who share our values and support our commitment to the prevention of modern slavery, human trafficking, and labour exploitation.

As such, AMS only engages suppliers who comply with our [Supplier Code of Conduct](#), our policies and values, and most importantly, successfully complete our rigorous due diligence assessment and sign up to our contractual terms and conditions that strictly prohibit any form of modern slavery in the provision of service to AMS, and where appropriate, also include rights of audit to so that we can identify any unethical practices.

## Policies relevant to modern slavery and human trafficking

AMS is shaped on the values of being bold, authentic, and passionate. These values are the cornerstone of our daily workplace culture and guide the way we do business by defining how we treat our clients, our candidates, our partners, our communities, and each other.

We are committed to acting ethically, with integrity, treating all individuals with fairness and respect and operating in a transparent environment with regards to all individuals and business partners. This commitment includes a zero-tolerance approach to any form of modern slavery.

Our commitment is demonstrated through the way we conduct our operations in accordance with set principles, procedures, and policies, as well as having appropriate governance and controls in place.

The following company policies support us in our commitment to ensure we work to the highest standards of integrity and ethical business practices<sup>1</sup> and to prevent modern slavery and human trafficking within our business and supply chain. They apply to all AMS companies and are available to all employees via our intranet.

Our policies are reviewed on at least an annual basis, or as needed to adapt to a change in legislation or regulations. We communicate all relevant policies to our employees and suppliers as soon as a new version is released or ad-hoc changes are made through available communication channels.

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<sup>1</sup> For more information on AMS's Ethical Business Policies please visit [Ethical Business Policies - AMS](#)

We expect all employees and suppliers to adhere to our policies and enforce compliance. Any employee who violates our policies will face disciplinary action which may lead to dismissal for gross misconduct. AMS also reserves the right to terminate our relationship with suppliers who do not meet our standards outlined in our policies and requirements set in the contractual terms and conditions.

- **AMS’s Global Code of Conduct (the “Code”)** – outlines our corporate values, behaviours and actions that all AMS employees are expected to adhere to and exemplify, including our zero-tolerance approach to any form of modern slavery. The Code is designed to provide a reference of standards in delivering services whilst ensuring compliance with applicable legislative and regulatory requirements. Furthermore, the Code is the foundation upon which our compliance policies and procedures are established.
- **Global Policy on Prevention of Fraud, Bribery and Corruption** – documents AMS’s stance on acts of fraud, bribery and corruption, money laundering, terrorist financing, tax evasion, conflict of interest and improper conduct (further referred to as prohibited acts) including when receiving or giving gifts or any forms of hospitality. It is to demonstrate our commitment and responsibilities to prevent these prohibited acts within AMS and our supply chain, and most importantly, to ensure AMS’s compliance with all laws and regulations addressing bribery and corruption in all countries we operate and provide services in.
- **Global Policy on Prevention of Human Trafficking, Forced Labour and Modern Slavery** – sets out our zero-tolerance approach to any form of modern slavery and our commitment to ensure human trafficking, forced labour and modern slavery are not taking place anywhere in our business and our supply chain.
- **Global Sanctions Policy** – sets out our commitment to comply with all applicable sanctions regulations in all countries we operate in. This policy, derived from the sanctions resolutions, laws, regulations and regulatory guidance of the United Nations Security Council, the United Kingdom, the European Union and the United States of America is designed to document AMS’s stance on sanctions regulations, help understand where issues related to sanctions regulations may arise in connection to our business and to support in making the right decisions in line with AMS’s position.
- **Supplier Code of Conduct** – we expect our suppliers to follow the very same high standards of integrity and ethical business practices as outlined in the Code. Our Supplier Code of Conduct sets out the values, behaviours, and conduct, including zero-tolerance to any form of modern slavery, that AMS requires all suppliers, their employees, and contractors to demonstrate. Among other conditions, adherence to the principles of our Supplier Code of Conduct is a prerequisite to engaging a new supplier.
- **Procurement & Supply Management Policy** – sets out guidelines and processes relating to the procurement of goods and services on behalf of AMS for both internal use and where goods and services are procured in support of client service delivery. Among other things, it outlines our commitment to ensure our supply chain is free from any form of modern slavery where clear terms and conditions of business are agreed with suppliers, appropriate contractual flow downs and proper due diligence are in place.
- **3<sup>rd</sup> Party Assurance Policy** – sets out the framework for the effective identification, assessment, and management of 3<sup>rd</sup> party risks, including risk related to modern slavery. It supports our commitment to ensuring that products and services provided to AMS by 3<sup>rd</sup>

parties do not expose our business to risk, comply with all applicable laws and regulations, and uphold our zero-tolerance policy towards modern slavery in our supply chain.

- **Employee Handbooks** – provide AMS employees with the information they need on AMS's company policies and employment practices, including HR policies, benefits at AMS, approach to probationary periods, our commitment to be an equal opportunity employer, our efforts to eliminate discrimination and harassment, bullying and victimisation, time off work policy, health and safety, grievance, and appeals procedures.
- **Global Workplace Anti-Bullying and Harassment Policy** – provides employees a better understanding of what constitutes bullying, harassment, and victimisation in the workplace, as well as a framework for addressing any incidents which may arise. It supports our commitment to treating everyone with respect and maintaining a culture free of intimidating, humiliating or victimising behaviour.
- **Global Diversity, Equity, Inclusion & Belonging (DEIB) Policy & Transgender Equality Policy** – outline our commitment to fostering an inclusive environment, making sustainable efforts that ensure diversity is not only reflected in our teams but is deeply embedded in how we work and collaborate, and addressing systemic barriers for underrepresented groups to enable inclusion for all.
- **Occupational Health & Safety Management Policy** – documents AMS's commitment to provide safe and healthy working environment and conditions for all employees and any other persons who may be directly affected by our activities. It outlines the general structure and system for the management of Occupational Health & Safety Management for AMS's global operations in order to prevent accidents and cases of work-related ill health and to ensure that significant risks arising from work activities under our control are eliminated or adequately controlled.
- **Volunteering, Charity and Corporate Social Responsibility (CSR) Policy** – documents AMS's commitment to conducting business ethically and responsibly, contributing positively to society through supporting communities and addressing social, environmental, and economic challenges, fostering colleague engagement and teamwork through volunteering opportunities, promoting a culture of giving back within the organisation and enhancing our corporate reputation and brand by demonstrating our commitment to social responsibility.
- **Raising a Concern Policy** – sets out our commitment to maintaining an open culture with the highest standards of honesty and accountability, where employees as well as third parties can report any legitimate concerns in confidence related to any aspect of our operations, including any actual or suspected incidents related to modern slavery. It also promotes the concept that compliance is everyone's responsibility and supports our zero-tolerance approach to any form of retaliation to individuals who raise concerns in good faith.

# Risk management and due diligence processes in relation to modern slavery and human trafficking in our business and supply chain

AMS has deployed a comprehensive risk programme with risk registers maintained across all areas of the business which are reviewed and updated regularly. The Risk and Compliance Committee, with members including the Chief Executive Officer, Chief Financial Officer and Chief Legal, Risk & Compliance Officer, sits bi-monthly and assesses the appropriateness of risk treatment plans accordingly. It reports to AMS's Audit Committee.

Any concerns raised via our confidential Raising Concerns channels are reviewed and investigated by an appropriate subject matter expert and reported to the Risk and Compliance Committee. Disciplinary and termination procedures are managed by Human Resources should an individual or group of individuals breach any of our policies.

We have identified two key areas of risks in relation to modern slavery and human trafficking, one relates to our employees, and the other relates to our supply chain. For both areas, we have developed and implemented appropriate due diligence programmes which we review regularly to ensure their effectiveness in preventing modern slavery.

## **Our employees**

We are taking the appropriate steps to ensure that everyone who works at AMS benefits from a working environment in which their fundamental human rights are respected and that anyone we do business with also upholds these principles.

The below demonstrates steps we take to ensure our processes and practices are appropriate and mitigate the risk of any opportunity for modern slavery occurring in our business.

- We ensure our recruitment practices are fair and transparent, and we never retain original ID or visa documents (e.g., a physical passport) nor directly or indirectly charge any fees to employees or candidates to work at AMS and as such paying the full costs associated with recruitment in line with the Employer Pays Principle<sup>2</sup>.
- All AMS employees have a clear written contract, which sets out the terms and conditions of the employment relationship, including the notice period for bringing the contract to an end. These terms enable AMS employees to exit the contract with AMS should they wish.
- In all of our locations, we operate in accordance with relevant country laws and regulations, including those related to working time and rest breaks. Working hours are contractually agreed with all AMS employees and we do not prevent AMS employees from taking appropriate breaks during a shift.
- We financially compensate all AMS employees fairly and always in line with relevant legislation. We have procedures and controls in place to ensure minimum wage requirements are always met in all jurisdictions we operate in.
- We have appropriate policies and procedures for conducting background screening and all

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<sup>2</sup> As per the [Institute for Human Rights and Business](#)

AMS employees undergo pre-employment screening checks before they commence work. This screening may include criminality checks (unless prohibited by local law).

- We run a comprehensive internally developed modern slavery awareness programme for AMS employees to ensure they understand how to comply with the requirements of our Global Policy on Prevention of Human Trafficking, Forced Labour and Modern Slavery underpinned by a dedicated mandatory training course to be completed upon joining AMS. All employees are required to refresh their awareness each year.
- All AMS employees have access to Raising Concerns channels to confidentially raise concerns about any actual or suspected activity that contravenes our Code, including our zero-tolerance approach to modern slavery.
- We actively support wellbeing and safety of all our employees by offering flexible ways of working and providing an array of resources to support their mental, physical, social and financial health, including our confidential and independent Employee Assistance Programme (EAP).

## Our supply chain

We expect our suppliers to follow the very same high standards of integrity and ethical business practices as outlined in the [Supplier Code of Conduct](#) and we take appropriate steps to ensure our supply chain is free from any form of modern slavery.

- The Procurement & Supply Management Policy is owned by the Chief Financial Officer with oversight delegated to the Global Head of Procurement. AMS's Procurement & Supplier Management Team use a risk-based approach to monitor implementation of and adherence to the policy and its application in the supply chain.
- Third-party risk and the associated mitigation plans are monitored by the Risk and Compliance Committee on a bi-monthly basis.
- All prospective suppliers of AMS are required to pass due diligence checks before being accepted. AMS applies a comprehensive due diligence programme in order to drive the best standards of compliance which includes international sanctions and adverse media checks to prevent any suppliers violating human rights or modern slavery legislation entering our supply chain. Moreover, suppliers are only engaged where they have met the minimum prevailing standards, including appropriate safeguarding policies around modern slavery.
- We enforce our [Supplier Code of Conduct](#) that outlines expectations regarding labour practices and ethical behaviour and only work with suppliers who demonstrate a commitment to ethical and fair labour standards.
- Suppliers are engaged on terms and conditions which are inclusive of requirements to comply with legislation preventing modern slavery such as the UK Modern Slavery Act 2015. AMS has the right to terminate any contract where there has been a breach of those terms or any other non-compliance with AMS policy.
- Where possible, we operate a short supply chain to warrant good visibility and transparency of our supply chain. We expect our tier 1 suppliers to engage tier 2 and below suppliers on terms and conditions which mirror AMS's requirements and are inclusive of requirements to comply with legislation preventing modern slavery.

- All AMS suppliers have access to Raising Concerns channels via AMS’s website to confidentially raise concerns about any actual or suspected activity that contravenes our Code, including our zero-tolerance approach to modern slavery.

While we recognise that risk of modern slavery and human trafficking may exist within our business and supply chain, and as such we take appropriate steps to mitigate it, we assess our risk exposure to modern slavery as very low.

Firstly, our wide array of talent acquisition and talent consulting services concentrates on the professional skills market, and we typically do not employ, nor supply to our clients, individuals working in the areas that are considered to be carrying a higher risk of exposure to modern slavery such as domestic work, fishing, garment industry, construction and mining sector, manual manufacturing, or agriculture<sup>3</sup>.

Secondly, our operations concentrate in countries with robust labour laws and strict enforcement mechanisms, and the vast majority of our suppliers are based or originate from the UK, US, and EU, i.e., countries that are not considered to have a high risk of modern slavery<sup>4</sup> and where’s the strongest government response to modern slavery.

Finally, we have had no reported instances of modern slavery occurring in our business and supply chain since the Modern Slavery Act was enacted in all UK jurisdictions in 2015.

## Training on modern slavery and human trafficking

E-learning training and awareness activities are in place to ensure AMS employees understand how to comply with our policy requirements. Our Global Policy on Prevention of Human Trafficking, Forced Labour and Modern Slavery and the corresponding online training module, covering, among other things, the common warning signs that an individual subjected to modern slavery may display and what an employee should do if they observe any of these, including how to safely report violations. The policy and training are reviewed annually by the Global Head of Risk & Compliance along with this modern slavery statement.

All new AMS hires are required to undergo the induction training which includes a module on Preventing Human Trafficking, Forced Labour and Modern Slavery and subsequently move onto our rolling annual compliance awareness training programme to refresh their knowledge. Completion of these tasks are assigned, tracked, and prompted where required on AMS’s Learning Management System and compliance is assured by people managers.

Additionally, as part of our mandatory policy awareness programme, we expect all AMS employees to comply with the Code and associated AMS policies, and they are required to refresh their knowledge of key AMS policies on an annual basis and complete the underlying training. This industry best practice enables us to monitor and drive compliance with company requirements in the most efficient manner.

Our policies, reviewed on at least an annual basis, or upon a change in legislation or regulation, are maintained on the AMS intranet and are accessible by all employees.

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<sup>3</sup> As per [Global Slavery Index | Walk Free](#)

<sup>4</sup> As above

## Key performance indicators to measure effectiveness of steps taken

We measure effectiveness of steps we undertake to prevent modern slavery and human trafficking in our business and our supply chain against the key performance indicators (KPIs) developed and implemented by AMS’s Risk and Compliance function following internal consultations. Key results are reported to the Risk and Compliance Committee on a regular basis and appropriate actions are agreed and undertaken to remedy and shortcomings.

KPI	Target
Percentage of AMS employees attested to have read and agreed to abide by our Global Code of Conduct on an annual basis	100%
Percentage of AMS employees completed the Preventing Modern Slavery Training and attested to have read and agreed to abide by our Global Policy on Prevention of Human Trafficking, Forced Labour and Modern Slavery on an annual basis	100%
Percentage of new suppliers successfully completed our due diligence and meeting our minimum standards and expectations with regards to the detection and prevention of modern slavery	100%
Number of breaches of the Modern Slavery Act reported during a fiscal year in our business and supply chain	0
Percentage of key AMS policies related to integrity and ethical business practices, including our Global Code of Conduct and the Global Policy on Prevention of Human Trafficking, Forced Labour and Modern Slavery, reviewed at least on annual basis, or as required by legislation changes	100%
Maintain ISO 45001 certification (an ISO standard for management systems of occupational health and safety)	Certification maintained
Percentage of concerns related to modern slavery raised via Raise Your Concern channels investigated and resolved within three months	100%

## Highlights of the financial year 2024

Each year AMS continues to mature its compliance activities across the organisation. This includes activities we take to improve our response to the prevention of modern slavery and human trafficking in our business and supply chain.

Below are the highlights of the progress made in the financial year 2024:

- We continued to raise awareness about modern slavery risks by reviewing our policies, procedures and training materials to ensure we continue doing business in an ethical and responsible way. We also continued our efforts to ensure high completion rates of the mandatory training, including one addressing modern slavery and human trafficking.
- We continued to encourage everyone to speak up when concerned through promotion of our global whistleblowing channels to enable raising concerns in relation to breaches of our Code and our policies, including the Global Policy on Prevention of Human Trafficking, Forced Labour and Modern Slavery. Our channels are available via our intranet and AMS's website.
- We continued engaging with employee representatives through local works councils and formal collective bargaining agreements to enable structured social dialogue on key employment matters, such as working conditions, organisational changes, and employee wellbeing.
- We continued investing in the growth of our people by hosting a dedicated week-long programme focused on career development and learning.
- We continued to prioritise wellbeing and safety of our employees by offering flexible ways of working and providing our colleagues with an array of resources to support their mental, physical, social and financial health, including our confidential and independent Employee Assistance Programme (EAP), Global Health & Wellbeing Employee Resource Group (ERG), Mental Health Awareness programme and a network of our Mental Health and Wellbeing Ambassadors. Throughout the financial year 2024, we also celebrated a broad range of wellbeing-focused events to support employee wellbeing, mental health, and inclusion.
- We continued our partnership with Unmind, a leading workplace wellbeing platform created to help businesses build better wellbeing strategies with science-backed tools, by providing a confidential and free to use platform to support wellbeing and mental health of our contingent workers.
- We continued to run a confidential Every Voice Matters (EVM) survey amongst our employees to gather their feedback on an array of matters related to working at AMS enabling us to take positive steps to make tangible improvements to our organisation.
- We continued to make sustainable efforts towards equity, ensuring that the diversity of our communities is reflected in the diversity of our employee groups, and creating a culture of inclusivity, where everyone feels a sense of belonging.
- We continued to enhance our Diversity, Equity, Inclusion and Belonging (DEIB) programme by committing to further develop our inclusive culture, working to involve and engage all colleagues, irrespective of where they are based. We set our 11 award-winning Employee Resource Groups (ERG) up for success, uplifting underrepresented voices and empowering

them to make meaningful change across the business and will continue to work on improving the ethnicity/race representation globally at a senior level in the organisation. We also developed new programmes to support the career growth of mid-level ethnically underrepresented colleagues and improve our diversity supplier strategy.

- We continued to work only with suppliers who share our values and ethical and responsible business standards as outlined in our [Supplier Code of Conduct](#). We also ensured that all our newly engaged suppliers completed our due diligence in the financial year 2024 and met our minimum standards and expectation in relation to employment laws and prevention of modern slavery and human trafficking. We also ensured that they signed up to our terms and conditions which are inclusive of requirements to comply with relevant legislation for prevention of modern slavery.
- We added 3<sup>rd</sup> Party Assurance Policy and Global Workplace Anti-Bullying and Harassment Policy to our portfolio of operational policies relevant to modern slavery.
- We continued improving content of our relevant policies and supporting training materials to account for legal and regulatory changes, best industry practice, benchmarking against other organisations and stakeholders' feedback.
- Understanding the risks of human trafficking and exploitation that those affected by the war in Ukraine may face, we continued engaging in a number of activities to support citizens of Ukraine through organising numerous local charities, fundraising and volunteering activities and running the AMS Career Centre in Poland to provide hundreds of refugees with support with adaptation and finding employment.



## **Document Control**

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