Modern Slavery Statement

It continues to be a priority for Oliver James to ensure that modern slavery is eliminated from our business and supply chains.

Our Company

We are Oliver James, a global recruitment & consulting group that has been introducing talented people to great organisations since 2002. As a business, we operate across 30 countries from 15 offices globally. We are proud to be an inclusive, progressive and enjoyable place to work, in an environment which will not tolerate modern slavery in any of its forms.

Our commitment and actions

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 in order to exploit them for personal or commercial gain. Oliver James has developed a global Modern Slavery Policy (**Policy**) which applies to the Oliver James group. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains, where we acknowledge risks outside of our control could arise. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our global contracting processes, we include where possible specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we contractually require where possible our suppliers and business partners to hold their own suppliers to the same high standards. We will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains, if applicable. We have reviewed and updated our internal procurement policy to empower our stakeholders to be better informed of potential modern slavery risks when engaging with new suppliers and business partners and mitigate these.

This statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. We are proud to confirm that in we pay the Living Wage Foundation accredited rate for England to all relevant employees and contractors as a minimum.

Oliver James has overall responsibility for ensuring this statement complies with our legal and ethical obligations, and that all those under our control comply with it. Oliver James has primary and day-to-day responsibility for implementing this statement, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this statement and the issue of modern slavery in supply chains. Our staff are invited to comment on this statement and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the General Counsel.

Compliance with the statement.

All employees are provided with the Policy as part of their induction with the business and must comply with the Policy which is consistent with the terms of this statement. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All of those who this statement applies to are required to avoid any activity that might lead to, or suggest, a breach of this statement. Employees must notify their line manager or(in the case of those who are not employees) a company Director as soon as possible if they believe or suspect that a conflict with this statement has occurred or may occur in the future. All of those who this statement applies to are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If someone to whom this statement applies believes or suspects a breach of this statement has occurred or that it may occur, they must notify (in the case of an employee) their line manager or (in the case of those who are not employees) a company Director or report it in accordance with our Whistleblowing Policy (where applicable) as soon as possible. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this

statement, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If someone to whom this statement applies believes that they have suffered any such treatment, they should inform (in the case of an employee) their line manager immediately. If the matter is not remedied, and the individual is an employee, they should raise it formally using our Grievance Procedure, which can be found in the employee handbook. We will monitor any reports of breach and ensure that these are addressed appropriately.

This statement, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication. We are considering an improved training program for all staff members. Our zero-tolerance approach to modern slavery will be communicated where possible to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter via this published statement on our website.

Any employee who breaches this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this statement and/or contractual terms related to this statement.

This statement has been prepared by Adam Labbett, General Counsel, and is signed on behalf of the Oliver James Group by Graeme Edwards, Director and Chief Financial Officer. The statement will be revised and republished in Q2 2025.

June 2024