

This is the slavery and human trafficking statement of the Oliver James UK companies for the financial year ending 31<sup>st</sup> December 2025, made pursuant to section 54(1) of the Modern Slavery Act 2015. .

It continues to be a priority for Oliver James to ensure that modern slavery is eliminated from our business and supply chains and this statement sets out the steps we have taken, and continue to take, to prevent modern slavery and human trafficking in our own operations and our supply chains.

### **Our Company**

We are Oliver James, a global talent solutions business that has been introducing talented people to great organisations since 2002. 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. This statement covers the Oliver James UK companies (including our operations and entities listed in the Appendix) for the financial year ending 31 December 2025.

As at 31 December 2025, the Oliver James Group employed approximately 600 colleagues and had a total turnover of £315m, operating through 21 legal entities across 11 jurisdictions, in the United Kingdom, Europe, United States and Asia Pacific. We provide permanent, contract and temporary recruitment, outsourced solutions (MSP/RPO), and consultancy services to clients across a range of professional sectors.

### **Our supply chains**

Our supply chains fall into two broad categories.

The first supply chain comprises the workers and candidates we place with, or supply to, clients. As a provider of staffing services, we recognise our sector can be targeted by traffickers and unlicensed labour providers. Where candidates or workers are introduced through third-party recruitment businesses or labour providers, we undertake appropriate due diligence before engagement. In some jurisdictions we also engage workers through employer of record (EoR) and professional employer organisation (PEO) partners, who employ or engage those workers on our or our clients' behalf. As these partners hold the direct employment relationship - including responsibility for contracts, pay and right-to-work checks - we seek assurance that they uphold the same standards we apply ourselves, and we factor them into our due diligence and supplier controls.

The second supply chain comprises the goods and services we procure to operate our business, such as IT, telecommunications and technology, professional and consultancy services, facilities management, cleaning, office supplies, marketing, and business travel and accommodation. We seek to maintain close relationships with, and good visibility of, our tier 1 suppliers. During 2026 we intend to further map higher-risk areas of our supply chain and improve visibility of suppliers beyond tier 1.

### **Our commitment and actions**

. 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 as referenced above.

Oliver James has reviewed and updated our global Modern Slavery Policy (Policy) in 2025, which applies to the Oliver James Group. Alongside the Policy, our framework of relevant policies and controls includes our Code of Conduct, our Procurement Policy, and our Whistleblowing Policy. These are owned and overseen at senior management level and are reviewed on a regular basis.

We have also reviewed and updated our internal procurement process and developed a new supplier portal and accompanying procurement policy for centralising and aligning our supplier onboarding process. This has empowered our internal stakeholders to be better informed of potential modern slavery risks when engaging with new suppliers and business partners and mitigate these. This process allows the business to utilise technology to assess and automate the process of onboarding new suppliers. Our stakeholders are trained on their requirement to report any suspicious indicators of modern slavery during the course of the supplier relationship.

We expect high standards to avoid modern slavery 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 safeguard against such practices and 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 also contractually retain, and will use, the ability to terminate contracts where the supplier has failed to deal adequately with any such risks.

### **Assessing and managing risk**

We assess the risk of modern slavery across both our own operations and our supply chains. We recognise that risk is higher where workers are in lower-skilled or temporary roles, are working away from home, or are placed in, or supplied from, higher-risk sectors or geographies. We acknowledge that the absence of identified cases does not mean that no risk exists, and we remain alert to the possibility of exploitation within our operations and supply chains.

### **Due diligence: our people and candidates**

In addition to our supplier controls, we operate controls directed at the workers and candidates we engage and place. Before an individual is employed or placed, we verify their identity and right to work in the relevant jurisdiction, and we ensure they are entitled to a written contract setting out their hours, pay and notice rights. Where we are responsible for payment, wages are paid only into an account held in the worker's own name. We also screen our worker data for indicators that may suggest exploitation, such as multiple individuals sharing the same address, bank account or contact details, and we investigate and escalate any matches identified. Workers placed by us are free to leave their assignment on reasonable notice.

We have developed an online suite of training courses tailored to the Oliver James Group. The training introduces the risks of modern slavery, instructs how those risks may manifest within our supply chain, and the policy and processes Oliver James has in place to avoid those risks, including how to report them. The training was rolled out globally during 2025 and completion rates continue to increase through mandatory onboarding and refresher training. The training is reviewed annually.

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 do not charge workers, candidates or jobseekers any fee for finding or securing work, whether for a temporary assignment or a permanent position.

Oliver James has overall responsibility for this statement and for implementing it, monitoring its effectiveness and auditing the internal controls and procedures we rely on to counter 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 Chief Legal Officer.

### **Identifying and responding to concerns**

If a concern or potential indicator of modern slavery is identified, whether in our own operations or our supply chains, it would be escalated and investigated, with immediate consideration given to the safety and wellbeing of any affected individual. Our response would be designed to be proportionate and victim-focused, and may include corrective action plans with suppliers, enhanced monitoring, and suspension or termination of the relationship where concerns are not adequately addressed. Where appropriate, we would work with the relevant authorities and support organisations, including making a referral through the National Referral Mechanism and signposting the Modern Slavery & Exploitation Helpline (08000 121 700), so that affected individuals receive appropriate support. We encourage anyone to raise concerns in good faith, including for our internal staff through our Whistleblowing Policy, and we will not tolerate any detrimental treatment of those who do so.

### **Measuring our effectiveness**

We are in the early stages of measuring the effectiveness of our modern slavery programme. At present this is reflected mainly in the completion of our modern slavery training across the Group. As our programme matures, we intend to develop further measures to help us assess and improve our approach.

This statement is published in a prominent place on our website and is uploaded to the UK government's Modern Slavery Statement Registry. Previous statements remain available so that our progress can be tracked year on year.

This statement has been prepared by Adam Labbett, Chief Legal Officer, was approved by the Oliver James board on 22<sup>nd</sup> June 2026 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 2027.

**Appendix – entities covered by this statement**

This statement applies to Oliver James global operations and the UK entities listed below

| <b>Company Name</b>                   | <b>Registration Number</b> | <b>Country of Incorporation</b> |
|---------------------------------------|----------------------------|---------------------------------|
| Astral Search Limited                 | 13929560                   | England and Wales               |
| Avencia Talent Solutions Limited      | 10932950                   | England and Wales               |
| Oliver James Associates Group Limited | 09910015                   | England and Wales               |
| Oliver James Associates Limited       | 04447784                   | England and Wales               |
| Oliver James Topco Limited            | 13785384                   | England and Wales               |
| Oliver James Midco Limited            | 13786756                   | England and Wales               |
| Oliver James Bidco Limited            | 13787176                   | England and Wales               |