

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 Badenoch & Clark Limited (“we” or “our”) to prevent modern slavery and human trafficking in its business and supply chains during the year ending 31 December 2018.

Our Business

We have a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains. This is our third statement and we are continuing to strengthen our work in this area.

We supply recruitment services and are part of the Adecco group of companies (“The Adecco Group”), the global leader in HR solutions providing 360° services to individuals and organisations to successfully navigate through the entire work life cycle. We lead by example, creating shared value that meets social needs while driving business innovation.

We are also members of the Recruitment and Employment Confederation (REC), and work closely with REC to improve industry-wide standards and advocate improved laws and policies where appropriate.

Our Global Commitment to Human and Labour Rights

The Adecco Group has a long history of promoting human rights. As an HR solutions provider, we have a double responsibility when it comes to human rights, especially labour rights, towards our own colleagues, but also towards the associates whom we offer access to work with our clients. We are committed to fair and ethical recruitment practices and are continuously strengthening the ways in which we protect the rights of our employees, associates and candidates. We seek to take a leading role in our industry, as well as in the wider business community, working together to achieve quality employment.

In our commitment to workers’ rights, we embrace some of the most authoritative international resources in this field:

- Universal Declaration of Human Rights;
- International Labour Organisation (“ILO”) Declaration on Fundamental Principles and Rights at Work;
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- OECD Guidelines for Multinational Companies; and the
- UN Guiding Principles for Business and Human Rights.

We are eager to work with stakeholders along our full value chain to collaboratively change realities on the ground. Ensuring respect for human rights is a key contribution businesses can make to help achieve the Sustainable Development Goals.

In November 2003, The Adecco Group became the first organisation in our industry to sign the United Nations Global Compact. The Adecco Group is also an active member of the World Employment Confederation (WEC) and a committed signatory to the WEC Code of Conduct. This Code sets the gold standard for the employment and recruitment industry and reflects the principles of ILO Convention 181 that e.g. prohibit the charging of fees to jobseekers globally. Further, in November 2008, UNI Global Union and WEC members, including The Adecco Group, signed a memorandum of understanding to consolidate the industry's global social dialogue to achieve fair conditions for the temporary agency work industry.

In June 2013, the European Union commissioned sector-specific guidance for the employment and recruitment agencies sector on implementing the UN Guiding Principles on Business and Human Rights. The development of this guidance involved extensive research and multi-stakeholder consultation. The World Employment Confederation was involved in the drafting process from the beginning. The Adecco Group actively supported the World Employment Confederation and contributed to the various drafting and consultation phases.

The Adecco Group has published Human and Labour Rights Guidelines which set out the Adecco Group's commitment to international labour standards including the relevant ILO Conventions (i.e. 29, 105 (Forced Labour) and 181). These provide guidance and raise awareness amongst The Adecco Group's stakeholders. In our ongoing efforts to ensure fair working conditions and respect for human rights within our sphere of influence, they require our clients and suppliers to adhere to UN, ILO and OECD principles for human rights and multinational enterprises.

In June 2017, The Adecco Group also published a white paper, "The labour market integration of refugees – A focus on Europe" which showcases best practices of labour market inclusion by companies, including recommendations for both policy makers and employers to address inclusion.

In 2018, the Adecco Group launched a new, more integrated approach to sustainability and shared value creation. It sets us on course to fully integrate sustainability as the modus operandi across all our brands and countries in the next years. Our focus is on those factors that are most material to us as a business and to our stakeholders, and where we can make the biggest positive contribution. Consequently, the respect for human and particularly labour rights is one of the fundamental pillars of the framework, where we will focus on institutionalising best practices within our own operations and enhance our value proposition towards our stakeholders, as well as fuel innovation along the value chain.

Through the Adecco Group Foundation, we extend our positive impact, focusing on two key areas: work readiness for the underserved, whose potential is often overlooked, and workforce vitality, finding solutions to nurture a workforce that is healthy, resilient, and fit for purpose. Our ambition is to marry social value with sustainable business to create more value for all our stakeholders.

We will continue to challenge ourselves, and others, to push boundaries, and strive to be at the forefront of delivering better futures for all. By living up to our purpose and values and integrating them into how and why we do business, we can make the future work for everyone.

Local Policies

Our Anti-slavery and Human Trafficking Policy ("the Anti-slavery Policy") reflects our commitment to implementing and enforcing effective systems and controls to ensure

slavery and human trafficking is not taking place anywhere in our business and supply chains. The Anti-slavery Policy sets out our zero-tolerance approach to modern slavery and human trafficking. Every member of staff 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 all staff to report any wrongdoing (including any 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 including the Adecco Compliance and Ethics (“ACE”) Website:

<https://secure.ethicspoint.com/domain/media/en/gui/7017/report.html>

and the Adecco Compliance and Ethics Line:

<https://secure.ethicspoint.com/domain/media/en/gui/7017/phone.html>.

Both internet and telephone reporting are available 24 hours a day, 7 days a week. All reports will be fully investigated and remedial action and escalation to our board of directors will follow if appropriate. All policies are available to staff at all times via our internal intranet system.

Alternatively, for more information or guidance, or to report a case of modern slavery, the government’s Modern Slavery Helpline may be contacted on 0800 0121 700,

Supplier Code of Conduct

We have a long-standing approach to supply chain responsibility and so expect our suppliers to agree and adhere to our ethical standards for doing business. 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 United Nations Universal Declaration of Human Rights (“UN UDHR”), and the fundamental human rights and labour rights as articulated by the International Labour Organisation (“ILO”);
- treat and reward employees equally on the basis of the characteristics of their work and the intensity of their effort;
- provide, while taking into account 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.

As part of our commitment to continuous improvement, we committed in our previous statement to expand the audit requirements of prospective suppliers (where appropriate). To that end, we now seek further confirmation of all umbrella companies and consultancies to ask that:

- they have a documented anti-slavery policy in place;

- If not, they have as a minimum:
 - (i) undertaken a risk assessment to assess the risks of modern slavery in their business or supply chain;
 - (ii) procedures in place to manage the risks of modern slavery in their business and supply chain;
 - (iii) procedures in place to respond to incidents of modern slavery;
 - (iv) provide training or guidance to staff on the Modern Slavery Act 2015;
OR
 - (v) conduct audits of their own operations and suppliers.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff where relevant.

We have also published detailed guidance to staff on identifying and responding to an incident of modern slavery. This guidance is available at all times via our internal intranet system.

As part of our commitment to continuous improvement, we committed in our previous statement to increase internal awareness on identifying and responding to incidents of modern slavery and human trafficking. In response to that commitment we have updated our internal guidance; which included providing an overview of the Modern Slavery Act 2015, identifying some of the characteristics that could indicate that someone is a victim of modern slavery and details of where any such concerns should be reported to. We also provide the details for the government's Modern Slavery Helpline which provides both information and guidance on what to do next, and a facility to report concerns.

Due Diligence Processes

We have in place systems to:

- identify and assess potential risk areas in our supply chains (where appropriate);
- audit prospective suppliers (where appropriate);
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- protect whistle blowers.

Our Effectiveness in Combating Slavery and Human Trafficking

We have Business Process, Business Assurance, HR, Legal and Compliance teams dedicated to ensuring compliance with law, policy and process across the business. We review our policies and procedures on a regular basis to ensure ongoing compliance. The Business Assurance team regularly audits and assesses the

business to ensure and assess compliance. The results from these audits assist us in measuring how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

Further Steps

As an organisation, we are committed to building on what we do each year to prevent modern slavery and human trafficking. Following a review of the effectiveness of the actions we have implemented, we intend to:

1. Expand further on the training we provide to our Staff;
2. Further increase the due diligence we carry out on new Suppliers; and
3. Explore how we may work more closely with our clients to ensure respect for human rights along the full value chain.

This statement was approved by the board of directors on 20th March 2019 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

A handwritten signature in black ink, appearing to read 'Alex Fleming', with a stylized flourish at the end.

Alex Fleming