

THE ADECCO GROUP

Adecco AKKODIS LHH

# Modern Slavery Statement 2025

This Modern Slavery Statement (**Statement**) covers the activities of Adecco Holdings Pty Ltd (ABN 11 003 652 088) and its controlled entities (**Adecco Group Australia**) in accordance with the requirements of the Australian *Modern Slavery Act 2018* (Cth) (**Act**). This Statement explains the actions that Adecco Group Australia has taken to assess, address and prevent modern slavery and human trafficking risks in Adecco Group Australia's business and supply chains during the year ending 31 December 2024.

# About Adecco Group Australia

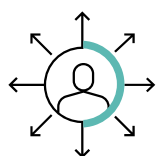
Adecco Group Australia is a part of the global [Adecco Group](#), a leading talent solutions and advisory company operating in over 60 countries. Our mission is to help businesses optimise their talent and transform their workforces while building the employability of people within the labour force. We are driven by a powerful purpose – **making the future work for everyone**. This is achieved through our three Global Business Units: Adecco, Akkodis, and LHH, which collectively offer workforce solutions, technology solutions and talent solutions.

Our vision, as published in our [Human and Labour Rights Position Statement](#), is for everyone to have the opportunity to gain or maintain access to the world of work and be enabled to reach their full potential. We strive to ensure that every job provides decent working conditions, fair remuneration, and

social protection. This vision is further supported by our commitment to conducting business without compromising human rights. We conduct due diligence and risk management within our business operations to protect these rights.

Adecco Group Australia is committed to promoting and maintaining a diverse and inclusive culture of respect and equal opportunity. We believe in the potential of people and are dedicated to delivering the right talent capabilities at the right time, enabling flexibility and agility for our clients. Our global scale, local knowledge, and ‘always-on’ approach allow us to match the best candidates across a wide range of office, industrial, and service sector roles. As a career partner, we support the employability of our associates and are committed to their success.

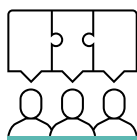
## Our services in Australia include:



Temporary staffing



Permanent placements



Total talent solutions



Workforce solutions



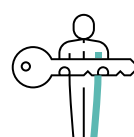
Technology consulting



Career transition and coaching



Talent development



Upskilling and reskilling

Aligned with the global Adecco Group of companies (The Adecco Group (SWX: ADEN)), Adecco Group Australia maintains a zero-tolerance approach to modern slavery and human trafficking within our business and supply chain. This is our fifth Statement for Australia covering the following entities:

Adecco Holdings Pty Ltd\*

Adecco Australia Pty Ltd

Adecco Industrial Pty Ltd

Advara Pty Ltd\*

Akkodis Australia Consulting Pty Ltd

Akkodis Australia Talent Pty Ltd

Lee Hecht Harrison Pty Ltd\*

Pontoon Australia Pty Ltd\*

TAD Pty Ltd\*

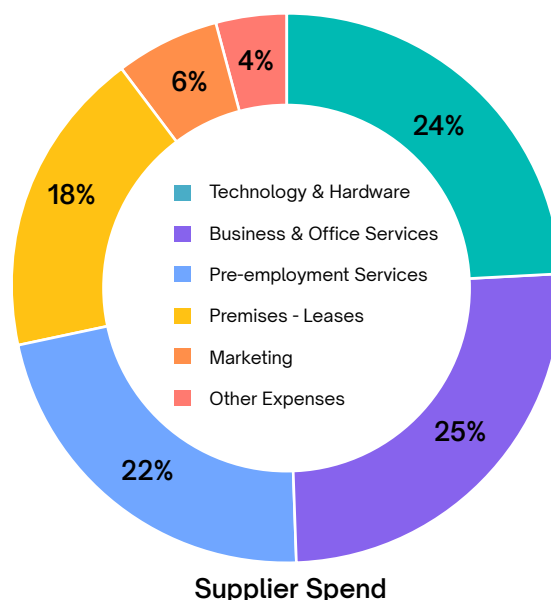
Spring Group Australia Pty Ltd\*

\*Voluntary reporting under the Act



# Our Supply Chain

Adecco Group Australia has continued to strengthen its centralised Procurement and Property function in Australia and New Zealand. In 2024, our business maintained a strong focus on cost management and transparency of supplier engagement. We have invested in promoting our local procurement policy through our Procurement and Property Team, which mandates due diligence on all vendors. This includes verifying if the potential vendor must report under the *Modern Slavery Act 2018* (Cth), assessing the vendor's policies and processes to identify, investigate, and remedy the risk of any instances of modern slavery, understanding any direct or indirect suppliers or subcontractors the vendor may be engaging, and ensuring compliance with Adecco Group Australia's Code of Conduct.



## Supplier Spend Categories

Premises - Leases	Adecco Group Australia does not own any premises in Australia and rents all office sites. This approach allows us to remain flexible and responsive to changing business needs while ensuring compliance with local regulations and standards.
Technology & Hardware	As a technology-enabled company, we engage external technology providers to maintain and deliver software, telecommunication, and professional services. These services are essential for providing support to our clients, candidates, contractors, and employees. Our technology partners help us stay at the forefront of innovation and ensure the seamless operation of our business.
Pre-employment Services	As a talent solutions company, we invest in pre-employment services as part of our screening processes. These services include background checks, verification of qualifications, and other assessments to ensure that we place the most suitable candidates in roles that match their skills and experience.
Business & Office Services	We utilise a range of business and professional services to support our internal operations and employees. This includes engaging auditors, external law firms, advisory services, and providers of maintenance and office supplies. These services encompass the provision of cleaning, catering, and stationery, ensuring that our offices are well-maintained and our employees have the resources they need to perform their roles effectively.
Marketing	As a talent advisory and solutions provider, we invest in a broad range of digital media channels and partner with creative agencies. These partnerships help us connect, attract, and engage with candidates and prospective clients, ensuring that we remain competitive in the market and can effectively meet the needs of our clients.

## Supplier Standards

We expect our suppliers to agree and adhere to our ethical standards for doing business, as outlined in our [Third Party Code of Conduct](#). These standards require suppliers to:

- refrain from holding a person in slavery or servitude, not arrange or facilitate the trafficking of any persons
- not purchase materials or services from companies that 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 based on the characteristics of their work and the intensity of their effort
- provide safe, hygienic, and healthy working environments
- provide rates of pay at the national legal standards
- act in accordance with applicable national and regional laws and regulations at all times.

We require key suppliers to commit to developing and maintaining policies and procedures to avoid engaging in modern slavery, notifying Adecco Group Australia promptly upon becoming aware of any complaint or allegation that the supplier has engaged in modern slavery, and providing prompt assistance and information when requested by Adecco Group Australia.

Adecco Group Australia has implemented a supplier governance and management process to ensure transparency of costs, measure performance, identify key risks and issues, monitor compliance, and agree on sustainability targets. This process includes sustainability and Diversity, Equity and Inclusion (DE&I) considerations when reviewing property/office locations, increasing visibility of supplier spend and categories, and strengthening our Procurement Policy.

By integrating these practices into our supply chain management, Adecco Group Australia is committed to promoting ethical business conduct and preventing modern slavery in all forms.



# Modern Slavery Risks

Adecco Group Australia is unwavering in its commitment to upholding human rights and ensuring that modern slavery has no place in our operations or supply chains. While we do not operate in the high-risk sectors identified in the “report of the statutory review of the Modern Slavery Act 2018 (Cth): The first three years,” we recognise that certain risk factors may potentially cause, contribute to, or be directly linked to modern slavery practices. These risk factors include specific types of products and services, geographic locations, and business models. Our approach to identifying and mitigating these risks is comprehensive and proactive, ensuring that we remain vigilant and responsive to emerging threats.

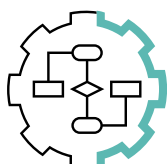
Risk factor	Our approach	
<b>Types of Products and Services</b>	Certain products and services are inherently more susceptible to modern slavery risks. These include sectors where low-skilled labour is prevalent, such as manufacturing, agriculture, and construction.	We are particularly attentive to these areas, ensuring that our suppliers adhere to stringent ethical standards.
<b>Geographic Locations</b>	The risk of modern slavery varies significantly by region. Countries with weak labour laws, high levels of corruption, and poor enforcement of regulations are more likely to harbour modern slavery practices.	We conduct thorough due diligence on suppliers operating in high-risk regions to ensure compliance with our ethical standards.
<b>Business Models</b>	Certain business models, such as those relying heavily on subcontracting and temporary labour, can obscure visibility into labour practices and increase the risk of modern slavery.	We work closely with our suppliers to ensure transparency and accountability throughout the supply chain.

Addressing modern slavery aligns with our purpose, culture, and values as an organisation. We are dedicated to promoting and maintaining a diverse and inclusive culture of respect and equal opportunity. Our global policy on [Human and Labour Rights](#) clearly articulates our responsible recruitment and employment practices, respect for human and labour rights across our value chain, and our commitment to regular risk assessments, supplier monitoring, and stakeholder dialogue.



## Compliance with Labour Hire Laws and Regulations

Adecco Group Australia is a licensed labour hire agency and complies with all state licensing schemes, including regular reporting requirements. In sourcing candidates for our clients, Adecco Group Australia has a dedicated Industrial and Employment Relations team that ensures all pay rates meet the relevant industrial award, conditions, and the *Fair Work Act 2009* (Cth). Working rights are verified prior to any engagements to reduce the risk of exploitation and to ensure that we engage workers who have valid working rights in Australia and compliant with any visa conditions if applicable. This includes educating our clients and prospective clients on relevant entitlements for workers and ensuring compliance.



## Suppliers and Their Supply Chains

Adecco Group Australia engages suppliers that represent a lower inherent risk of modern slavery. However, we acknowledge that visibility of modern slavery risks may be limited through the engagement of a third party. Through supplier due diligence and setting the standard of ethical and legally compliant operations, we seek to reduce and mitigate any modern slavery risks. This includes:

- **Supplier Standards:** We expect our suppliers to agree and adhere to our ethical standards for doing business, as outlined in our [Third Party Code of Conduct](#).
- **Supplier Commitment:** We require key suppliers to commit to developing and maintaining policies and procedures to avoid engaging in modern slavery, notifying Adecco Group Australia promptly upon becoming aware of any complaint or allegation that the supplier has engaged in modern slavery, and providing prompt assistance and information when requested by Adecco Group Australia.

By integrating these comprehensive measures into our operations and supply chain management, Adecco Group Australia is steadfast in its commitment to eradicating modern slavery and promoting human rights across all aspects of our business.



# Actions to address risks of modern slavery practices in our operations

Adecco Group Australia is committed to taking proactive measures to address potential risks of modern slavery within our operations and supply chains. Our approach is multifaceted, focusing on supplier rationalisation, governance, sustainability, DE&I considerations, and continuous improvement of our procurement policies and practices.

In 2020, Adecco Group Australia commenced a supplier rationalisation project aimed at reducing the number of suppliers, promoting and educating the *Modern Slavery Act*, and increasing our understanding of our supply chain. This project enabled us to rationalise our existing list of suppliers, analyse risks, and monitor the rate of supplier code of conduct acceptance. By reducing the number of our suppliers, we have positioned ourselves to take a more proactive approach in monitoring and working with our suppliers more effectively to mitigate and minimise any potential risks of modern slavery practices. In recognition of the Importance of this project, the practices of rationalising and reviewing our existing suppliers is embedded as an ongoing practice.

## Supplier Governance

We have strengthened our supplier governance by conducting comprehensive reviews of our top suppliers for sustainability and modern slavery risk mitigation. As part of this initiative, we issued a due diligence questionnaire to key suppliers to ensure compliance with regulations and ethical sourcing practices. This process helps us deepen our engagement with our suppliers, and identify and address any potential risks of modern slavery within our supply chain, ensuring that our suppliers adhere to the highest ethical standards.

## Sustainability and DE&I in Property Reviews

In line with our commitment to promoting inclusivity and accessibility, we have embedded DE&I considerations into our property selection process. This decision aligns with our modern slavery risk framework and demonstrates our dedication to creating an inclusive work environment. We will continue to prioritise these factors in future property decisions to ensure that our workplaces are accessible and inclusive for all.

## Procurement Policy Updates

We have updated our Procurement Policy to mandate modern slavery risk assessments for all new suppliers. This ensures that our suppliers comply with key policies and that risk-based due diligence is applied throughout the procurement process. By implementing these updates, we aim to enhance our ability to identify and mitigate modern slavery risks within our supply chain.



### Training and Awareness

To build awareness and understanding of modern slavery risks, we run Modern Slavery e-Module training for our employees. This training equips our staff with the knowledge and skills needed to identify and address modern slavery risks effectively. It is part of our broader commitment to fostering a culture of ethical business practices and ensuring that our employees are well-informed about the importance of preventing modern slavery.

### Governance and Monitoring

Our supplier governance and management process ensures transparency of costs, performance measurement, risk identification, compliance monitoring, and sustainability target setting. This process includes regular audits and assessments to ensure ongoing compliance with our standards. By maintaining rigorous oversight of our suppliers, we can proactively address any potential risks of modern slavery and ensure that our supply chain operates ethically and responsibly.

### Adecco Compliance & Ethics Reporting Tools

Adecco Group Australia actively promotes a culture of speaking up within our organisation. Supported by our global Adecco Compliance &

Ethics (ACE) Reporting Tool, employees, on-hired workers, and third parties can report any actual or potential violations of the law, code of conduct, policies, or procedures. Reports can be made 24/7 via the ACE hotline or [ACE Reporting Line](#), including anonymous reports if required. This speak-up culture is crucial in identifying and mitigating risks related to modern slavery, as it encourages transparency and accountability, ensuring that any concerns are promptly addressed and resolved.

### Continuous Improvement

We are committed to continuously improving our efforts to prevent modern slavery. This includes regular reviews of our policies and procedures, ongoing dialogue with our clients and suppliers, and reassessment of potential and existing suppliers to ensure compliance. Our dedicated in-house Procurement, HR, and Legal and Compliance teams play a crucial role in these efforts, ensuring that we remain at the forefront of ethical business practices.

By integrating these comprehensive measures into our operations and supply chain management, Adecco Group Australia is steadfast in its commitment to eradicating modern slavery and promoting human rights across all aspects of our business.



# Assessing the effectiveness of our actions

Adecco Group Australia is committed to ensuring that our initiatives to combat modern slavery and human trafficking are both effective and impactful. We adopt a holistic approach to evaluate the success of our actions, embedding a range of commitments, policies, procedures, and training programmes into our local business operations. This strategy is designed to guarantee ongoing compliance with relevant laws, policies, and processes, while fostering continuous improvement across our operations and supply chains.

Our dedication to preventing modern slavery is evident in our comprehensive suite of policies and procedures, including our [Code of Conduct](#), [Third Party Code of Conduct](#), [Human and Labour Rights Policy](#), and [Environmental Policy](#). These documents outline the standards and expectations for ethical business conduct, human rights, and environmental stewardship. We require our suppliers to comply with these standards and to implement measures to prevent modern slavery within their own operations and supply chains. This drives consistency in our engagements and a standard baseline of behaviours and conduct that we expect.

Understanding the importance of educating our employees, suppliers, and clients about modern slavery and ethical business practices is critical to raise awareness and we maintain a Modern Slavery e-Module. This training provides detailed guidance on identifying and addressing modern slavery risks and is mandatory for all employees. It aims to enhance awareness and understanding of our obligations and the steps we take to prevent modern slavery. This complements the other steps taken including supplier due diligence to effectively identify and manage modern slavery risks.

Our supplier governance and management process is a cornerstone of our efforts to prevent modern slavery. This process includes regular audits and assessments of our suppliers to ensure compliance with our standards. We have bolstered our supplier governance by conducting thorough reviews of our top suppliers for sustainability and modern slavery risk mitigation. Additionally, we utilise global procurement performance management software to record and monitor past, existing, and potential suppliers, giving us greater visibility and control over our supply chain to ensure the effective management of suppliers and any associated risks.

Adecco Group Australia fosters a culture of transparency and accountability through our Adecco Compliance & Ethics (ACE) Reporting Tools. These tools enable employees, associates, and third parties to report any actual or potential violations of the law, code of conduct, policies, or procedures. Reports can be made 24/7 via the ACE hotline or [ACE Reporting Line](#), including anonymous reports if necessary. This speak-up culture is vital in identifying and mitigating risks related to modern slavery, ensuring that any concerns are promptly addressed and resolved. We regularly review the reports holistically to identify any potential trends or emerging risks and this is an effective tool that encourages anyone to speak up.

We are dedicated to continuously enhancing our efforts to prevent modern slavery. This includes regular reviews of our policies and procedures, ongoing dialogue with our clients and suppliers, and reassessment of potential and existing suppliers to ensure compliance. Our in-house Procurement, HR, and Legal and Compliance teams play a crucial role in these efforts, ensuring that we remain at the forefront of ethical business practices.

To verify the effectiveness of our actions, we conduct both internal and external audits regularly. These audits help us identify areas for improvement and ensure ongoing compliance with our standards. Our in-house teams are responsible for reviewing global and local policies and procedures and implementing measures to address any identified risks.

Looking ahead, we are committed to building on our actions each year to prevent modern slavery and human trafficking. We will continue to provide accessible training to employees, enhance our dialogue with clients and suppliers, and assess potential and existing suppliers to ensure compliance. By maintaining a proactive approach and fostering a culture of continuous improvement, we aim to create a business environment that is free from modern slavery and promotes human rights. Further, by integrating these comprehensive measures into our operations and supply chain management, Adecco Group Australia is resolute in its commitment to eradicating modern slavery and promoting human rights across all aspects of our business.



## Approval and Consultation

This Statement is a joint statement submitted by Adecco Holdings Pty Ltd on behalf of its related bodies corporates. This followed briefings with the Executive Leadership Team by the local procurement and legal teams.

This Statement was approved by the board of directors on 2 June 2025 and is made pursuant to the *Modern Slavery Act 2018* (Cth).



Andrew Virgona  
Company Director



Edward Hanks  
Company Director



Candice Gin  
Company Secretary

# THE ADECCO GROUP

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