

2023 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.

Throughout 2022 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 external website](#) and the [UK Government's Modern Slavery Statement Registry](#) for the financial year ending 31 December 2022 in line with the requirements set out by the provisions 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 in our business and our 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 15 June 2023 and signed off by David Leigh, AMS's Chief Executive Officer on 15 June 2023.

Our structure and supply chain

AMS is a leading global total workforce solutions firm founded in 1996. We enable organisations to thrive in an age of constant change by building, reshaping and optimising workforces. We do this through Talent Acquisition Solutions, Talent Advisory Services, Digital Talent Solutions, and AMS Talent Lab.



We work across a broad portfolio of sectors including defence, energy, engineering, insurance, retail and investment banking, technology, digital, professional services, and the pharmaceutical sector. We are also incredibly proud to support a number of UK Government bodies. We work in a culturally rich and diverse tapestry of markets which we serve through local solutions in multiple languages.

Our solutions are delivered by our 9000+ experts located across the globe who live our passionate, bold, and authentic values¹. The ultimate aim is to help clients around the world, including 100+ blue-chip companies, create workforces that are fluid, resilient, diverse, and differentiated. We call this True Workforce Dexterity.

¹ Visit weareams.com for more details about AMS's values.

We recognise that our supply chain is critical to our success, and we work with 2000+ suppliers worldwide. The vast majority of our suppliers are businesses 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 & conditions that strictly prohibit any form of modern slavery in the provision of service to AMS.

Policies in relation to slavery and human trafficking

AMS was shaped and built on the values of being passionate, bold and authentic. These values have guided the way AMS does business, by defining how our personnel are expected to treat clients, candidates, partners, 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 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. We review our policies on a regular basis, and as needed, to adapt to changes.

- **AMS's Global Code of Conduct (the "Code")** – outlines our corporate values, behaviours and actions that all AMS personnel 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.

- **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.
- **Preventing Human Trafficking, Forced Labour and Modern Slavery Policy** – 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.
- **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 are in place and proper due diligence in line with AMS's 3rd Party Assurance programme is conducted before suppliers are engaged to assess a risk level of their services, including risk related to modern slavery.



- **Prevention of Fraud, Bribery and Corruption Policy** – 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, including but not limited to, the U.S. Foreign Corrupt Practices Act of 1977, as amended (the "FCPA"), the U.S. Travel Act, the U.S. Domestic Bribery Statute, the UK Bribery Act 2010, the Philippine Republic Act No. 3019 (The Anti-Graft and Corrupt Practices Act), the Indian Prevention of Corruption Act 1988, and local Criminal and Penal Codes.
- **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 ("UN"), the United Kingdom ("UK"), the European Union ("EU") and the United States of America ("US"), 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.
- **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.

- **Occupational Health & Safety 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 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.
- **UK Diversity, Equity and Inclusion Policy & Transgender Equality Policy** – outline our commitments to promoting diversity, equity and inclusion across all areas of our UK business and steps we take ensure we are creating an inclusive environment, free of unlawful discrimination as well as those transgender employees are treated with dignity and respect and are not disadvantaged in the workplace.
- **Raise Your Concern Claim and Investigation Process** – sets out our commitment to maintaining an open culture with the highest standards of honesty and accountability, where AMS personnel, our suppliers, and members of general public can report any legitimate concerns in confidence related to any aspect of our operations. Our online portal run on behalf of AMS by an independent third party, is accessible on the AMS corporate website, allows for confidential and anonymous reporting of breaches of our policies and behaviours that contravenes our Code, including any actual or suspected incidents related to modern slavery. AMS promotes the concept that compliance is everyone’s responsibility and takes a 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 program 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, Managing Director Legal, Risk & Compliance and an independent director, sits bi-monthly and assesses the appropriateness of risk treatment plans accordingly.

Any concerns raised via our confidential Raising Concerns channels are reviewed and investigated by an appropriate subject matter expert and concerns raised are 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 related to our personnel, and another related to our supply chain.

Our personnel

We are taking the appropriate steps to ensure that everyone who works for AMS benefits from a working environment in which their fundamental human rights are respected and anyone that 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 do not retain original ID or visa documents (e.g., a physical passport rather than a photocopy).
- AMS personnel 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 clear terms enable AMS personnel to exit the contract with AMS should they wish.
- In all of our global locations, we operate in accordance with relevant country legislation regarding working time and rest breaks. Working hours are contractually agreed with all AMS personnel and we do not prevent AMS personnel from taking appropriate breaks during a shift.
- We financially compensate AMS personnel fairly and always in line with relevant legislation. We have procedures and controls in place to ensure minimum wage requirements in all jurisdictions we operate in are always met.
- We have appropriate policies and procedures for conducting background screening and all AMS personnel undergo pre-employment screening checks before they commence work. This screening may include criminality checks (unless prohibited by local law).
- We never directly or indirectly charge any fees to employees or candidates to work for AMS.
- We run a comprehensive modern slavery awareness programme for AMS personnel to ensure they understand how to comply with our policy requirements underpinned by a dedicated mandatory training course to be completed within the first three months of joining AMS and all personnel are required to refresh their awareness each year.
- All AMS personnel 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.

Our supply chain

We expect our suppliers to follow the very same high standards of integrity and ethical business practices as outlined in the Code 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 Procurement & Supply Management Policy and its application in the supply chain.
- Third-party risk and the associated mitigation plan 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, with these activities being supported by an online third-party assurance registration tool. The tool enables AMS to apply a comprehensive due diligence program and drive the best standards of compliance. Suppliers are only engaged where they have met the minimum prevailing standards, including appropriate safeguarding policies around modern slavery.
- Suppliers are engaged on terms and conditions which are inclusive of requirements to comply with legislation 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.
- All AMS suppliers have access to Raising Concerns channels via AMS's external 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 recruitment services concentrates predominantly 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.

Secondly, our operations concentrate in countries with adequate labour laws and enforcement, and the vast majority of our suppliers are based or originate from UK, US, and EU, i.e., countries that are not considered to have a high risk of modern slavery as defined by the Global Slavery Index² and where there's the strongest government response to modern slavery.

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

² Global Slavery Index by Walk Free, www.globalslaveryindex.org.



Training on modern slavery and human trafficking

E-learning training and awareness activities are in place to ensure AMS personnel understand how to comply with policy requirements. Our Preventing Human Trafficking, Forced Labour and Modern Slavery Policy and the corresponding online training module, include 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. 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 each year. 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 personnel to comply with the Code and AMS policies, and they are required to refresh their knowledge of key AMS policies on an annual basis and complete the associated training. This is industry-wide best practise and 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 personnel.

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 following key performance indicators (KPIs):

| KPI | Target |
|--|--------------------------|
| Percentage of AMS personnel attested to have read and agreed to abide by our Global Code of Conduct on an annual basis | 100% |
| Percentage of AMS personnel completed the Preventing Modern Slavery Training and attested to have read and agreed to abide by our Preventing Human Trafficking, Forced Labour and Modern Slavery Policy 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 our supply chain | 0 |
| Percentage of key AMS policies related to integrity and ethical business practices, including our Global Code of Conduct and Preventing Human Trafficking, Forced Labour and Modern Slavery Policy, reviewed at least on annual basis or where 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 raised via Raise Your Concern channels investigated and resolved within three months | 100% |

Highlights of the financial year 2022-2023

Each year AMS continues to mature its compliance activities across the organisation. This includes activities we take to prevent modern slavery and human trafficking in our business and our supply chain. Below are the highlights of the progress made in the financial year 2022 -2023:

- We ensured health and safety compliance across all operating locations. We continued to prioritise wellbeing and safety of our personnel 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) and a network of certified Mental Health First Aiders.
- We continued raising awareness about modern slavery risks by reviewing and publishing all key AMS policies and underpinned training materials related to ethical business practices, including a refreshed Global Code of Conduct and Preventing Human Trafficking, Forced Labour and Modern Slavery Policy. We also ensured all our personnel successfully completed all relevant mandatory training.
- Understanding the risks of human trafficking and exploitation that those affected by the war in Ukraine may face, we engaged in a number of activities to support citizens of Ukraine including but not limited to corporate donations to fund medical supplies deliveries, organising numerous local charity, fundraising and volunteering activities and opening the AMS Career Centre in Poland to

provide hundreds of refugees with support in finding employment as well as providing our impacted Ukrainian colleagues with resources and support based on their specific needs. Our humanitarian efforts continue.

- We enhanced our Diversity, Equity and Inclusion (DEI) programme by improving a dedicated DEI training programme for our colleagues and establishing a new DEI Centre of Excellence (COE) with the purpose to lead on the internal DEI strategy for AMS and to support our business in ensuring that it is delivering DEI-centric solutions. We continued our commitment to hire more inclusively and give greater support to underrepresented groups through leveraging our Employee Resource Groups (ERG), Advisory Boards and external partners to better align with best industry practice.
- We enhanced our 3rd Party Assurance Programme by introducing international sanctions and adverse media checks for our suppliers to prevent any suppliers violating human rights or modern slavery legislation entering our supply chain. We also ensured all our newly signed-up suppliers who completed our due diligence in the fiscal year 2022-2023 met our minimum standards and expectation in relation to labour laws and prevention of modern slavery and human trafficking.
- We strengthened our approach to engaging umbrella companies (utilised in the provision of contingent workers) by introducing a Preferred Supplier List (PSL) with carefully selected providers to warrant the highest ethical business standards, including those related to the prevention of modern slavery and human trafficking. We also strengthened our due diligence procedures for umbrella companies with these activities being supported by our 3rd Party Assurance Programme.
- We continued promotion of our global whistleblowing channels to enable raising concerns in relation to breaches of our Code and our policies, including the Preventing Human Trafficking, Forced Labour and Modern Slavery Policy. Said channels are available to everyone via AMS's corporate website.

AMS is fully supportive of the Modern Slavery Act and its aims and will not knowingly support or deal with any business involved in modern slavery or human trafficking. It will continue to invest in compliance with its legal obligations.

