# ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

## Introduction

The Robert Walters Group recognises that slavery, servitude, forced labour and human trafficking (together "**Modern Slavery**") are issues of global concern.

We believe all businesses play a vital role in preventing Modern Slavery and, as such, we take our responsibilities seriously. This statement summarises the steps that the Robert Walters Group (the "**Group**") takes to enable our activities to be free of Modern Slavery.

This statement is made in compliance with the UK Modern Slavery Act 2015 (the "**MSA 2015**"), which is applicable to all organisations with a group turnover of £36 million or more that are incorporated in the UK or carry on a business in the UK.

### **Robert Walters Group Structure**

The Group is a global specialist professional recruitment consultancy and recruitment outsourcing business with operations in 31 countries. Our parent company, Robert Walters PLC, is listed on the London Stock Exchange.

This statement applies to all subsidiaries of the Robert Walters Group, including the following UK entities that are subject to the MSA 2015: Robert Walters Operations Limited; Resource Solutions Limited; and Resource Solutions Europe Limited.

### Our Approach

We are committed to acting ethically and with integrity in respect of all our staff and business relationships. This commitment includes a zero-tolerance approach to any imposition of, or connection to, Modern Slavery. We are prepared to implement sanctions where non-compliance has occurred.

Alongside our Whistleblowing Policy, Anti-Bribery and Fair Competition Policies, we encourage all our employees to voice any concerns relating to the activities of our own organisation, our supply chain, organisations to which we outsource and clients, which may indicate the presence of Modern Slavery.

We have set out the tangible steps we take to combat Modern Slavery below.

### Current Risk Assessment

We assess the risk of exposure to Modern Slavery to be extremely low in our business, our supply chain, organisations to which we outsource and clients. We conclude this on the basis of the following:

• The Group provides recruitment services only in the professional "white collar" recruitment services market which is not associated with Modern Slavery. We do not supply, or recruit individuals involved in manual manufacturing, construction or mining or individuals to

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provide domestic services which are areas of recruitment which could carry a greater risk due to a potential significant power imbalance between worker, agency and employer.

- We operate a short people supply chain with typically only one or two links below us. This provides high visibility of preferred suppliers and fosters transparency. Incorporation and credit checks are carried out on our suppliers and due diligence where appropriate.
- We expect our suppliers to have at least the equivalent standards in terms of ethics and legal compliance including their own policies on Modern Slavery. We also expect all our suppliers to comply with applicable laws and regulations.
- Very limited elements of the business are outsourced.

We appreciate that, although the low risk assessed today, that risk level may change if the business was to alter its current market focus or structure.

## Steps We Have Taken

During the current financial year, we intend to continue with the following steps to combat Modern Slavery:

- Our contracts of employment and contracts for our temporary workers comply with relevant local laws and ensure that individuals are entitled to at least the legal minimum (including written contract of employment, rights in relation to hours, pay and termination of the contract).
- We have appropriate policies and processes for conducting background checks on employees and candidates (including their right to work).
- No employee or candidate will ever be charged direct or indirect fees to obtain work from us or by us when acting for a client.
- We ensure all standard terms and conditions we produce for our supply chain and clients include appropriate provisions to require compliance with applicable anti-Modern Slavery legislation (including the MSA 2015).
- When working with a supplier or clients on their own terms and conditions which lack such provisions, we use reasonable endeavours to have anti-Modern Slavery provisions included and to encourage the acceptance of the principles in this statement.
- We will provide information on request in relation to compliance with applicable Modern Slavery prevention legislation to any competent authority.

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- We will ensure that preventing Modern Slavery is considered in any relevant policies and procedures across the Robert Walters Group.
- We will include prevention of Modern Slavery in the induction process for new staff as part of their training and in refresher compliance training.
- We will assess our approach to combat Modern Slavery on a regular basis.

This statement is made pursuant to the MSA 2015 with the approval of our Board of Directors and applies for the financial year 2023.

This statement applies to all our subsidiaries and shall be reviewed annually.

## **Richard Harris**

## **Chief Legal Officer and Company Secretary**

31 October 2023

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