

Modern Slavery & Human Trafficking Statement

Opening statement from Chief Legal & Information Officer

Spencer Ogden is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers. Slavery and human trafficking is an issue which can affect global businesses. Recognising this, Spencer Ogden makes every effort to ensure each employee remains vigilant against the associated risks in our business and in the wider supply chain, regardless of the size of the threat. We have implemented appropriate measures across the business to ensure best practice around issues with pose a threat to human rights and appropriate supplier checks based around governance and financial standing are always undertaken. It is expected that all of our colleague's report incidents of concern, and these are then addressed appropriately by our management team. We consider these measures adequate and appropriate to protect against slavery and human trafficking within our supply chain.

Structure of the organisation

Spencer Ogden is an award-winning global energy, engineering and infrastructure specialist in the recruitment sector. With its head office in London, Spencer Ogden has branched out over the years to establish offices across the globe; from Düsseldorf to Singapore, Houston to Perth, Spencer Ogden stands for the best in specialist, professional, proactive recruitment, working with skilled energy and infrastructure professionals across the globe.

Supply Chain Overview

The recruitment sector's supply chain can be complex, particularly for international engagements. Our supply chains include management companies, job boards, property, media, IT equipment, stationery and print suppliers, whilst our clients include international energy, engineering and infrastructure businesses. Spencer Ogden is committed to effectively managing its supply chain to ensure human rights are wholly respected.

Supply Chain Standards, Process and Due Diligence

As part of our commitment to combating modern slavery, Spencer Ogden regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain and has in place processes and procedures to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate risks, including slavery and human trafficking occurring in our supply chains;
- Continually monitor risk areas in our supply chains; and
- Protect whistleblowers, via a confidential and independent reporting process

In terms of specific steps taken to mitigate the risk of slavery and human trafficking occurring in our supply chains Spencer Ogden includes in its' standard terms of business with both candidates and clients, Spencer Ogden a commitment to the prevention of slavery and human trafficking. Furthermore, prior to conducting business with any client or third-party company, appropriate due diligence and compliance checks are completed to ensure no relationship is formed with parties who have a history of transgressions around human trafficking and modern slavery. Any parties in Spencer Ogden's supply chain discovered as having partaken in such offences would have their business relationship terminated without notice or delay.

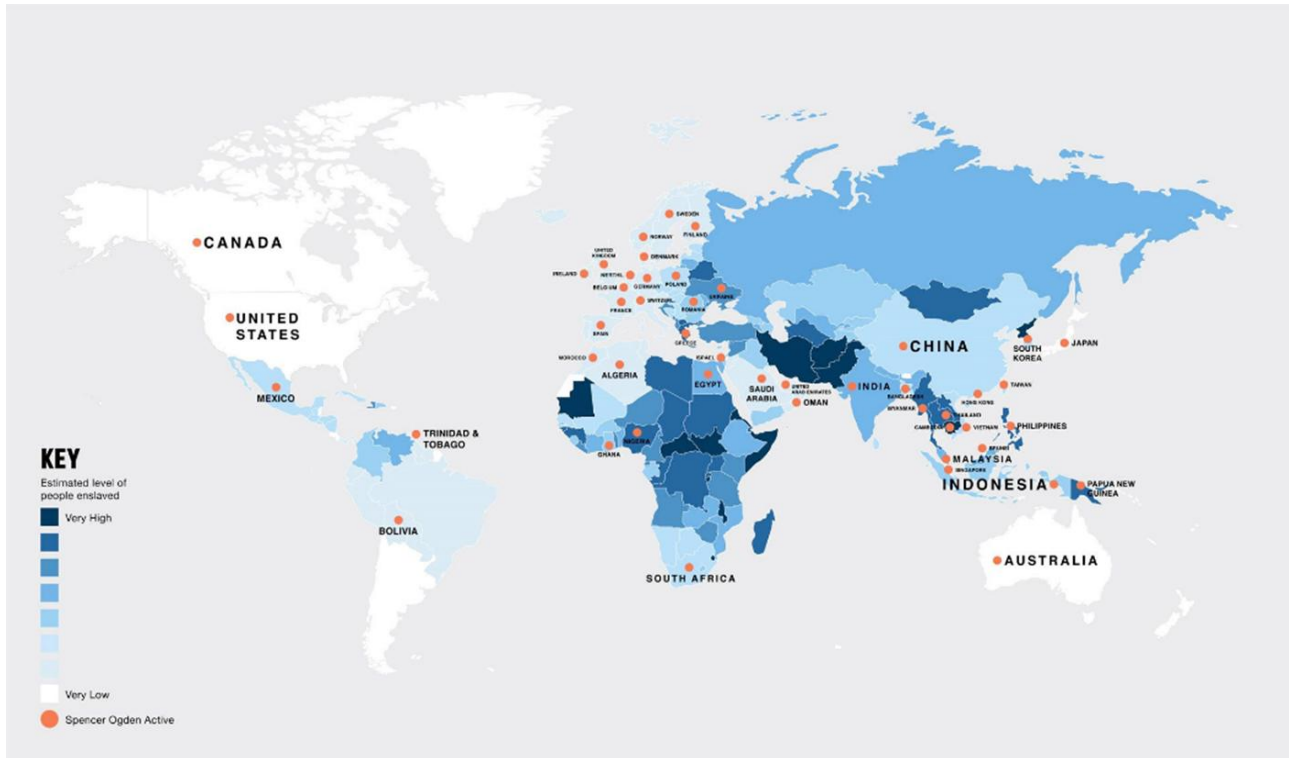
As a standard practice, Spencer Ogden's recruitment consultants communicate with potential candidates on an entirely direct basis. Not only does this prove a far more efficient method of identifying the ideal candidate in the timeliest of fashion, but it provides Spencer Ogden with crucial direct contact with the candidate,



The Queen's Awards for Enterprise: International Trade 2014

therefore giving additional comfort that Spencer Ogden has no exposure to the risk of modern slavery occurring in its supply chain. Importantly, all of our recruitment consultants are trained on the importance of vigilance around this upon their joining our organisation.

The below map shows the locations of our suppliers against the most recent Global Slavery Index, of which over 98% are based in countries considered between medium to very low risk.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Spencer Ogden's slavery and human trafficking statement for the current financial year.

Greg Morris
Chief Legal and Information Officer
February 2024