

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Opening Statement from the Chief Operating Officer

Spencer Ogden is committed to preventing acts of modern slavery and human trafficking within its business operations and throughout its supply chain. We expect and require the same high standards from all suppliers, partners, and third parties with whom we work.

Modern slavery and human trafficking are global issues that can affect organisations across all sectors. Recognising this risk, Spencer Ogden takes a proactive approach to ensuring that all employees remain vigilant to potential indicators of modern slavery within our business and wider supply chain, regardless of the perceived level of risk.

We have implemented appropriate policies, controls, and governance measures to promote best practice and safeguard human rights. This includes robust supplier due diligence processes based on governance, ethical standards, and financial standing. All colleagues are expected to report any concerns or suspected incidents, which are reviewed and addressed promptly by management. Spencer Ogden considers these measures to be proportionate, effective, and appropriate in mitigating the risk of modern slavery and human trafficking.

Structure of the Organisation

Spencer Ogden is an award-winning global specialist recruitment consultancy operating across the critical infrastructure, renewables and sustainability, and natural resources sectors. Headquartered in London, the business has established a global presence with offices across EMEA, APAC, and the Americas, including locations such as Düsseldorf, Singapore, Houston, and Perth.

Spencer Ogden provides specialist, professional, and proactive recruitment services, partnering with skilled professionals and leading organisations worldwide to support critical projects and long-term workforce needs.

Supply Chain Overview

The recruitment sector operates within a diverse and sometimes complex supply chain, particularly for international engagements. Spencer Ogden's supply chain includes, but is not limited to, management companies, job boards, property services, media and marketing providers, IT equipment suppliers, stationery, and print vendors. Our client base consists primarily of international energy, engineering, and infrastructure organisations.

Spencer Ogden is committed to managing its supply chain responsibly and ensuring that human rights are respected throughout all business relationships.

Supply Chain Standards, Processes, and Due Diligence

As part of our commitment to combating modern slavery and human trafficking, Spencer Ogden regularly assesses the nature and extent of any potential risks within its supply chain. We maintain processes and procedures designed to:

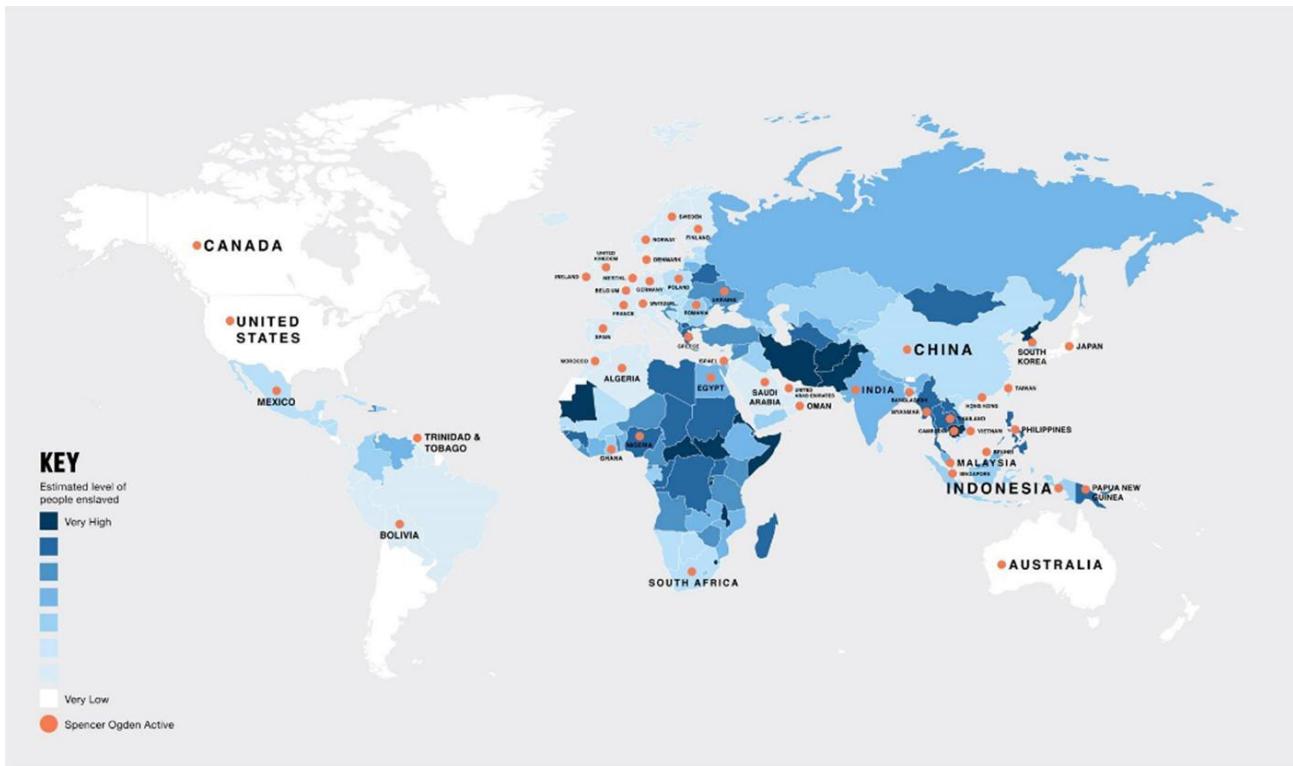
- Identify and assess potential risk areas within our supply chains
- Mitigate risks associated with modern slavery and human trafficking
- Continually monitor and review identified risk areas
- Protect whistleblowers through a confidential and independent reporting process

To further mitigate risk, Spencer Ogden includes commitments to the prevention of modern slavery and human trafficking within its standard terms of business with clients and candidates. Prior to engaging with any client, supplier, or third party, appropriate due diligence and compliance checks are undertaken to ensure that Spencer Ogden does not enter into relationships with organisations that have a history of involvement in modern slavery or human trafficking.

Any supplier or third party found to have engaged in such practices will have their business relationship with Spencer Ogden terminated immediately.

As standard practice, Spencer Ogden recruitment consultants communicate directly with candidates rather than through intermediaries. This direct engagement not only supports efficient and transparent recruitment processes but also provides additional assurance that Spencer Ogden is not exposed to risks associated with modern slavery. All recruitment consultants receive training upon joining the organisation to ensure they understand the importance of vigilance and compliance in this area.

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.

Tom Reid
Chief Operating Officer
January 2026