

A|M|S

People powered partnership

2026

Modern Slavery Statement

For the financial year ending 31 December 2025



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. We understand that by doing so, we not only protect vulnerable workers and help prevent human rights violations but also protect AMS’s reputation as a trusted partner to our customers.

AMS is fully supportive of the Modern Slavery Act and its aims and will not knowingly support or deal with any individuals, businesses or organisations involved in modern slavery or human trafficking. It is our long-term commitment to continue investing in compliance with our legal obligations.

Throughout the financial year 2025 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 website](#) and the [UK Government’s Modern Slavery Statement Registry](#) for the financial year ending 31 December 2025 in line with the requirements set out in Section 54 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 occurring in our business and 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 27th May 2026 and signed off by Gordon Stuart, AMS’s Chief Executive Officer on 27th May 2026.

Our structure and supply chain

AMS is a global talent solutions business partnering with organisations to deliver the next generation of talent acquisition. Our services span the full hiring lifecycle across permanent, contingent and early careers workforces, combining human expertise with digital capability and strategic technology partnerships. Our core offerings include Recruitment Process Outsourcing (RPO), Contingent Workforce Solutions (CWS), early careers solutions, talent consulting and skills creation, delivered through scalable outsourced models tailored to client needs.

<p>Next Gen Talent Acquisition</p> <ul style="list-style-type: none"> Recruitment Process Outsourcing Contingent Workforce Solutions Early Careers & Campus Skills Creation Executive Search 	<p>Consulting</p> <ul style="list-style-type: none"> AI and Digital Transformation Employer Brand Diversity, Inclusion, Equity & Belonging Skills Assessment Talent Technology 	<p>Digital Talent Solutions</p> <ul style="list-style-type: none"> AMS One Verified 
--	---	--

Global enterprise clients rely on AMS to align talent strategies with their business objectives and growth plans. We act as trusted advisors, applying deep market insight, data-led decision making and responsible use of technology and AI to deliver better outcomes for clients and candidates alike, while maintaining a strong focus on ethical and compliant business practices.

AMS operates across a wide range of sectors, including banking and financial services, digital and technology, energy, engineering and industrial, government, pharmaceutical and life sciences, professional services, and retail and hospitality. We support clients globally, delivering locally tailored solutions across more than 120 countries and in over 50 languages, reflecting the diverse markets in which we operate.

Our services are delivered by more than 8,000 colleagues and an established network of advisory consultants located across the Americas, EMEA and APAC. Our global footprint includes primary offices and delivery centres in the United Kingdom (Global HQ in London), Poland, United States, Canada, Mexico, the Philippines, China and India, enabling us to combine global scale with local market expertise.

Our supply chain plays a critical role in the delivery of our services, and we work with over 3,000 suppliers worldwide. We work with a global network of suppliers, including employment agencies and employment businesses, technology providers, and professional service firms. The majority of our suppliers are located or operate in the United Kingdom, the United States, and the European Union.

We recognise that labour supply chains present an inherent risk of modern slavery, human trafficking and labour exploitation. As a result, AMS is committed to working only with suppliers that share our values and support our commitment to ethical and responsible business conduct.

All suppliers are required to comply with our [Supplier Code of Conduct](#) and relevant AMS policies, successfully complete proportionate due diligence assessments, and agree to contractual terms that prohibit any form of modern slavery or human trafficking in the provision of services to AMS. Where appropriate, our arrangements also include audit and monitoring rights designed to help identify and address any unethical or non-compliant practices within our supply chain.

Policies relevant to modern slavery and human trafficking

AMS is shaped on the values of being bold, authentic, and passionate. These values are the cornerstone of our daily workplace culture and guide the way we do business by defining how we treat our clients, our candidates, our partners, our 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 practices¹ 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.

Our policies are reviewed on at least an annual basis, or as needed to adapt to a change in legislation or regulations. We communicate all relevant policies to our employees and suppliers as soon as a new version is released or ad-hoc changes are made through available communication channels.

We expect all employees and suppliers to adhere to our policies and enforce compliance. Any employee who violates our policies will face disciplinary action which may lead to dismissal for gross misconduct. AMS also reserves the right to terminate our relationship with suppliers who do not meet our standards outlined in our policies and requirements set in the contractual terms and conditions.

- **AMS’s Global Code of Conduct (the “Code”)** – outlines our corporate values, behaviours and actions that all AMS employees 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.
- **Global Policy on Prevention of Fraud, Bribery and Corruption** – 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.
- **Global Policy on Prevention of Human Trafficking, Forced Labour and Modern Slavery** – 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.
- **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, the United Kingdom, the European Union and the United States of America 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.
- **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.

¹ For more information on AMS’s framework for ethical, responsible and compliant business practices please visit our [Trust Center](#).

- **Procurement 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 and proper due diligence are in place.
- **Third-Party Assurance Policy** – sets out the framework for the effective identification, assessment, and management of third-party risks, including risk related to modern slavery. It supports our commitment to ensuring that products and services provided to AMS by third parties do not expose our business to risk, comply with all applicable laws and regulations, and uphold our zero-tolerance policy towards modern slavery in our supply chain.
- **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.
- **Global Workplace Anti-Bullying and Harassment Policy** – provides employees a better understanding of what constitutes bullying, harassment, and victimisation in the workplace, as well as a framework for addressing any incidents which may arise. It supports our commitment to treating everyone with respect and maintaining a culture free of intimidating, humiliating or victimising behaviour.
- **Global Diversity, Equity, Inclusion & Belonging (DEIB) Policy & Transgender Equality Policy** – outline our commitment to fostering an inclusive environment, making sustainable efforts that ensure diversity is not only reflected in our teams but is deeply embedded in how we work and collaborate, and addressing systemic barriers for underrepresented groups to enable inclusion for all.
- **Occupational Health & Safety Management 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 Management 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.
- **Volunteering, Charity and Corporate Social Responsibility (CSR) Policy** – documents AMS's commitment to conducting business ethically and responsibly, contributing positively to society through supporting communities and addressing social, environmental, and economic challenges, fostering colleague engagement and teamwork through volunteering opportunities, promoting a culture of giving back within the organisation and enhancing our corporate reputation and brand by demonstrating our commitment to social responsibility.
- **Global Concern Reporting Policy** – sets out our commitment to maintaining an open culture with the highest standards of honesty and accountability, where employees as well as third parties can report any legitimate concerns in confidence related to any aspect of our operations, including any actual or suspected incidents related to modern slavery. It also

promotes the concept that compliance is everyone's responsibility and supports our 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 programme 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 and Chief Legal, Risk and Compliance Officer, sits bi-monthly and assesses the appropriateness of risk treatment plans accordingly. It reports to AMS's Audit Committee.

Any concerns raised via our confidential Raising Concerns channels are reviewed and investigated by an appropriate subject matter expert and 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 relates to our employees, and the other relates to our supply chain. For both areas, we have developed and implemented appropriate due diligence programmes which we review regularly to ensure their effectiveness in preventing modern slavery.

Our employees

We are taking the appropriate steps to ensure that everyone who works at AMS benefits from a working environment in which their fundamental human rights are respected and that anyone 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 ensure our recruitment practices are fair and transparent, and we never retain original ID or visa documents (e.g., a physical passport) nor directly or indirectly charge any fees to employees or candidates to work at AMS and as such paying the full costs associated with recruitment in line with the Employer Pays Principle².
- AMS respects employees' freedom of movement and does not restrict their ability to resign or change roles in accordance with their contractual notice period and applicable law.
- All AMS employees 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 terms enable AMS employees to exit the contract with AMS should they wish.
- In all of our locations, we operate in accordance with relevant country laws and regulations,

² As per the [Institute for Human Rights and Business](#).

including those related to working time and rest breaks. Working hours are contractually agreed with all AMS employees and we do not prevent AMS employees from taking appropriate breaks during a shift.

- We financially compensate all AMS employees fairly and always in line with relevant legislation. We have procedures and controls in place to ensure minimum wage requirements are always met in all jurisdictions we operate in.
- Employees are paid directly into a personal bank account in their own name and receive appropriate pay information to ensure transparency and understanding of their remuneration.
- We have appropriate policies and procedures for conducting background screening and all AMS employees undergo pre-employment screening checks before they commence work. This screening may include criminality checks (unless prohibited by local law).
- We provide internally developed modern slavery awareness materials and training in a way that is accessible to our workforce and proportionate to risk, helping employees understand the warning signs of exploitation, and how to seek help if concerns arise. All employees are required to refresh their awareness each year.
- Employees are encouraged to speak up and engage openly with their managers or People & Culture team where they have questions about working conditions, pay, or employment practices.
- All AMS employees 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.
- AMS maintains a strict non-retaliation approach and does not tolerate any form of victimisation, intimidation or detriment against employees who raise concerns or report suspected misconduct, including concerns related to modern slavery or labour exploitation.
- We actively support wellbeing and safety of all our employees by offering flexible ways of working and providing an array of resources to support their mental, physical, social and financial health, including our confidential and independent Employee Assistance Programme (EAP).
- Modern slavery controls relating to employee treatment are overseen through AMS's global policy framework and governance arrangements, with regular review of policies, training completion and raising-concerns activity to support continuous improvement.

Our supply chain

We expect our suppliers to follow the very same high standards of integrity and ethical business practices as outlined in the [Supplier Code of Conduct](#) and we take appropriate steps to ensure our supply chain is free from any form of modern slavery.

- AMS applies a risk-based approach to supplier management, enabling enhanced scrutiny, monitoring and mitigation measures for suppliers operating in higher-risk geographies, sectors or labour-intensive services where the risk of modern slavery may be higher.
- The Procurement 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 policy and its application in the supply chain.

- AMS expects suppliers to understand and effectively manage modern slavery risks within their own operations and supply chains and may support this through clear contractual expectations, guidance and engagement where appropriate, particularly for labour supply partners.
- All prospective suppliers of AMS are required to pass due diligence checks before being accepted. AMS applies a comprehensive due diligence programme in order to drive the best standards of compliance which includes international sanctions and adverse media checks to prevent any suppliers violating human rights or modern slavery legislation entering our supply chain. Moreover, suppliers are only engaged where they have met the minimum prevailing standards, including appropriate safeguarding policies around modern slavery.
- We enforce our [Supplier Code of Conduct](#) that outlines expectations regarding labour practices and ethical behaviour and only work with suppliers who demonstrate a commitment to ethical and fair labour standards.
- Suppliers are engaged on terms and conditions which are inclusive of requirements to comply with legislation preventing modern slavery 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 potential or actual compliance issues are identified, AMS engages suppliers to agree corrective action plans and remediation measures. Failure to address identified concerns may result in escalation, enhanced oversight or termination of the supplier relationship.
- Third-party risk and the associated mitigation plans are monitored by the Risk and Compliance Committee on a bi-monthly basis.
- Where possible, we operate a short supply chain to warrant good visibility and transparency of our supply chain. We expect our tier 1 suppliers to engage tier 2 and below suppliers on terms and conditions which mirror AMS's requirements and are inclusive of requirements to comply with legislation preventing modern slavery.
- All AMS suppliers have access to Raising Concerns channels via AMS's 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 talent acquisition and talent consulting services concentrates 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 agriculture³.

Secondly, our operations concentrate in countries with robust labour laws and strict enforcement mechanisms, and the vast majority of our suppliers are based or originate from the United Kingdom, the United States, and the European Union, i.e., countries that are not considered to have a high risk of modern slavery⁴ and where's the strongest government response to modern slavery.

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

Training on modern slavery and human trafficking

E-learning training and awareness activities are in place to ensure AMS employees understand how to comply with our policy requirements. Our Global Policy on Prevention of Human Trafficking, Forced Labour and Modern Slavery and the corresponding online training module, covering, among other things, 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, including how to safely report violations. The policy and training are reviewed annually by the Risk and Compliance Global Director 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. 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 employees to comply with the Code and associated AMS policies, and they are required to refresh their knowledge of key AMS policies on an annual basis and complete the underlying training. This industry best practice 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 employees.

³ As per [Global Slavery Index | Walk Free](#).

⁴ As above.

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 key performance indicators (KPIs) developed and implemented by AMS’s Risk and Compliance function following internal consultations. Key results are reported to the Risk and Compliance Committee on a regular basis, and appropriate actions are agreed and undertaken to remedy and shortcomings.

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

Highlights of the financial year 2025

Each year AMS continues to mature its compliance activities across the organisation. This includes activities we take to improve our response to the prevention of modern slavery and human trafficking in our business and supply chain.

Below are the highlights of the progress made in the financial year 2025:

- We continued to raise awareness about modern slavery risks by reviewing our policies, procedures and training materials to ensure we continue doing business in an ethical and responsible way. We also continued our efforts to ensure high completion rates of the mandatory training, including one addressing modern slavery and human trafficking.
- We continued to encourage everyone to speak up when concerned through promotion of our global whistleblowing channels to enable raising concerns in relation to breaches of our Code and our policies, including the Global Policy on Prevention of Human Trafficking, Forced Labour and Modern Slavery. Our channels are available via our intranet and AMS's website.
- We continued engaging with employee representatives through local works councils and formal collective bargaining agreements to enable structured social dialogue on key employment matters, such as working conditions, organisational changes, and employee wellbeing.
- We continued investing in the growth of our people by hosting a dedicated week-long programme focused on career development and learning.
- We continued to prioritise wellbeing and safety of our employees 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), Global Health & Wellbeing Employee Resource Group (ERG), Mental Health Awareness programme and a network of our Mental Health and Wellbeing Ambassadors. Throughout the financial year 2025, we also celebrated a broad range of wellbeing-focused events to support employee wellbeing, mental health, and inclusion.
- We continued our partnership with Unmind, a leading workplace wellbeing platform created to help businesses build better wellbeing strategies with science-backed tools, by providing a confidential and free to use platform to support wellbeing and mental health of our contingent workers.
- We continued to run a confidential Every Voice Matters (EVM) survey amongst our employees to gather their feedback on an array of matters related to working at AMS enabling us to take positive steps to make tangible improvements to our organisation.
- We remained resolute in our commitment to Diversity, Equity, Inclusion and Belonging (DEIB), building a culture of belonging for all, driving business success through diverse representation, equitable outcomes and inclusive practices that strengthen our people, partnerships and performance.
- We continued to develop our inclusive culture, working to involve and engage all colleagues, irrespective of where they are based. We set our 11 award-winning Employee Resource Groups (ERG) up for success, uplifting underrepresented voices and empowering them to

make meaningful change across the business and will continue to work on improving the ethnicity/race representation globally at a senior level in the organisation.

- We continued our “EmBue” development programme to support the career growth of mid-level ethnically underrepresented colleagues in the United Kingdom and Ireland.
- We continued to work only with suppliers who share our values and ethical and responsible business standards, as outlined in our [Supplier Code of Conduct](#). The Supplier Code of Conduct is issued to onboarded suppliers and sets out our expectations in relation to ethical business conduct, compliance with employment laws, human rights, anti-bribery and corruption, and the prevention of modern slavery and human trafficking. During the financial year 2025, all newly engaged suppliers completed our due diligence process, met our minimum standards and expectations, and signed up to our terms and conditions, which include requirements to comply with relevant modern slavery legislation.
- We continued to apply our Third-Party Assurance framework to supplier onboarding, including risk-based due diligence checks before engagement. Strategic or higher-risk suppliers were subject to enhanced review where appropriate, including consideration of human rights, labour practices, ethical conduct, information security and wider compliance risks.
- We continued improving content of our relevant policies and supporting training materials to account for legal and regulatory changes, best industry practice, benchmarking against other organisations and stakeholders’ feedback.
- Understanding the risks of human trafficking and exploitation that those affected by the war in Ukraine may face, we continued engaging in a number of activities to support citizens of Ukraine through organising numerous local charities, fundraising and volunteering activities and running the AMS Career Centre in Poland to provide hundreds of refugees with support with adaptation and finding employment.
- We continued to maintain controls across our recruitment and onboarding processes, including right to work checks, contractual documentation and procedures designed to ensure workers and candidates are treated fairly and transparently. These controls support our commitment to preventing forced labour, worker exploitation, unlawful recruitment practices and other forms of modern slavery.
- We continued to use internal governance, risk management and assurance processes to monitor compliance with key policies and controls, including those related to ethical conduct, supplier assurance, employee wellbeing, health and safety, and responsible business practices.
- We continued to participate in external responsible business assessments, including EcoVadis, which provide additional insight into our labour and human rights, ethics, sustainable procurement and environmental management practices and support continuous improvement.



Document Control

Copyright Statement | Copyright © 2026 Alexander Mann Solutions Limited hereafter referred to as AMS.

All rights reserved. This is a copyright document and AMS reserve all rights to both the form and content of this document.