

# Anti-Slavery and Human Trafficking Statement for the financial year ending 30 June 2023

This statement sets out the steps that Daniel J Edelman Limited ("Edelman UK") and its subsidiaries have taken to prevent slavery and human trafficking in its supply chains and in other parts of its business.

## OUR BUSINESS

We are a leading communications firm helping businesses and organisations evolve, promote and protect their brands and reputations. Our business in the UK forms part of the Edelman family of companies which are collectively held by Daniel J. Edelman Holdings, Inc ("DJE").

Edelman UK's London office is the hub for many of DJE's global and European clients. It houses teams of brand, reputation, research and digital strategists who drive award-winning creative communication programmes.

## OUR POLICIES AND ETHOS

We have several policies in place to prevent slavery and human trafficking in our supply chains and other parts of our business. Our policies include:

- **Code of Conduct:** DJE's Code of Conduct outlines the ethical responsibilities of our employees and addresses common compliance and ethics issues facing global businesses today. The code is supplemented by the Day-to-Day Situation Guide, which addresses issues specific to our industry.
- **Human Rights Policy:** Our Human Rights Policy focuses on fostering an open and inclusive workplace based on human rights and includes the following components: respect for human rights, equal opportunity and non-discrimination, fair pay and working conditions, health and safety, prohibition of child labour and forced/bonded labour, support for freedom of association and the right to collective bargaining, the prohibition of bribery and the provision of a safe and secure working environment.
- **Code of Ethics for Suppliers and Service Providers:** DJE's Code of Ethics for Suppliers and Service Providers sets out the standards we require our subcontractors, freelancers, suppliers and other third parties to meet.

Edelman UK does not permit, condone or otherwise accept any form of slavery and/or human trafficking (as defined in the Modern Slavery Act 2015) by its employees, subcontractors, contractors, agents, partners or any other organization, entity, body, business or individual with whom we engage or do business.

As a signatory of the U.N. Global Compact, we support internationally accepted principles regarding human rights, labour standards, the environment and anti-corruption, including the United Nations Declaration and core ILO conventions.

We encourage all our employees, customers and other business partners to report to the DJE management, legal or compliance teams, or DJE's Listen Line, any concerns they may have regarding our direct activities or our supply chains. This includes any circumstances that may give rise to increased risk of slavery or human trafficking. Our Listen Line (see details in our Code of Conduct) is designed to make it easy for employees to make disclosures in a confidential manner without fear of retaliation.

If Edelman UK suspects any slavery and human trafficking by an associated party, we reserve the right to report such suspicions, provide appropriate information to the relevant authorities and to suspend or terminate any associated engagement, business arrangement or contract.

## OUR SUPPLY CHAIN

Edelman UK source from thousands of suppliers across the world with the majority of this spend concentrated in the UK. We buy goods and services for our internal use and our client work. We internally consume goods and services related to IT, travel, telecommunications, professional services, facilities and IT management with established large organisations. We also use smaller suppliers in our client work, who provide photography, production work, market research operations and other marketing support services.

We work with a network of affiliates and partners across the European region to serve clients where we do not have a physical presence. We have a Code of Conduct that is specific to these relationships, and we have obtained their contractual commitment to adhere to our ethical standards. We conduct due diligence when considering new firms for addition to our affiliate network and are closely engaged with the clients they serve on our behalf so that we would be made aware of any concerns regarding the affiliates' work.

## RISKS IN OUR SUPPLY CHAIN AND STEPS TAKEN TO ASSESS AND MANAGE THE RISK

While Edelman UK, as a professional services firm, may have a low risk of slavery or human trafficking within our business activities, we have established a broad policy approach to reflect our commitment to principles-based behaviour and delivering on societal and operational responsibilities.

We believe the greatest risk of slavery and human trafficking is in that part of our supply chain which is outside the direct control of Edelman operations and managerial oversight personnel. To help manage this risk, we use our Code of Ethics for Suppliers and Service Providers so that subcontractors, freelancers, suppliers and other third parties understand and agree to comply with our expected standards in business dealings related to Edelman UK.

This year, Edelman UK moved its office location to a newly-refurbished building in Central London. As part of this process, Edelman UK engaged with contractors in the construction industry, project managers, architects, designers and several other

suppliers to oversee the office refurbishment. With the construction sector being one of the UK's largest and most important economic sectors and one which is vulnerable to the threat of modern slavery, Edelman UK has taken steps to sign up as a subcontractor under the Government's Construction Industry Scheme.

In addition, we have reviewed the whole supplier base of our UK businesses considering geographical risk indices pertaining to human rights, the level of supply chain control and levels of political stability. While low, we believe our greatest risk lies with our facility management suppliers. During the tendering process, we vet these suppliers and score them against a risk matrix. This process helps us ensure that our suppliers perform due diligence and have processes in place to maintain the national minimum wage or the London Living wage (as appropriate), to provide adequate maternity benefits and to comply with working time limitations.

Edelman UK specifically requires suppliers to comply with the Modern Slavery Act 2015 in contracts where appropriate. In our standard terms with suppliers, we require suppliers to confirm they have not committed an offence under anti-slavery laws, are not under investigation for such an offence, are not aware of circumstances in their supply chain that could give rise to an anti-slavery offence and have effective controls in place to ensure compliance with anti-slavery laws.

## OUR EFFECTIVENESS IN ENSURING THAT SLAVERY AND HUMAN TRAFFICKING IS NOT TAKING PLACE

We know that maintaining high standards of conduct is not achieved solely by good intentions. It is achieved by clarity in articulating our mission and values to both our employees and stakeholders. Our Principles, as stated in our Code of Conduct, articulate the following core commitments:

- We are committed to honesty, transparency, fair dealing, diversity, equity and inclusion;
- We ensure business activity aligns with the interests of all stakeholders: clients, employees, and parties with whom we interact; and
- We strive to model best practice in all areas of our business. We do not violate legal obligations.

As we believe there is not a significant risk of slavery or human trafficking in our business, we do not have any key performance indicators specific to this area. However, we monitor and review business practices which mitigate slavery or human trafficking risk including a continuous programme of training for our employees on our Code of Conduct and continuous reviews of employee engagement scores, grievances and similar workplace matters. Our full-time compliance and ethics team, together with the HR team, monitor completion of our continuous training programme on an on-going basis.

## OUR APPROACH TO TRAINING

We are committed to giving our employees the tools to guide proper behaviour, including a Code of Conduct, a Day-to-Day Situation Guide, an ethics helpline, online training, a compliance employee intranet site and other compliance and ethics related policies and procedures. Our compliance and ethics team is available to support our staff globally as needed, with hubs in Europe, the U.S. and Asia Pacific. We invest in educating our staff on our Code of Conduct. Through this training, our employees are encouraged to identify and report illegal or unethical activity.

## OUR COMMITMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Edelman UK's anti-slavery and human trafficking statement for the financial year ending 30 June 2023.

The board of directors of Edelman UK has considered and approved this statement by board resolution on 20 November 2023, following which the Statement was signed by a Director.

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**Ed Williams, Director**