



# Modern Slavery Act Transparency Statement

## Sterling (EMEA) Ltd.

### Organization

Sterling is a world leading background screening and identity services company for the evolving global workforce. Sterling provides the foundation of trust and safety our clients need to create great environments for their most essential resource, people. We believe everyone has the right to feel safe. Our values, policies, and people-centric culture are aligned with the goals of the Modern Slavery Act, and keep Sterling consistently equipped to recognize, address, and communicate potential cases of forced labor and human trafficking.

This year, Sterling has taken steps to combat and prevent modern slavery in our supply chain, has exercised due diligence obligations on new vendors and clients, scheduled ongoing vetting of our existing vendors, and required employees to complete training on our Code of Conduct and relevant policies.

### Commitment

As a leader in our industry, Sterling recognizes the necessity of our role in helping to combat and report modern slavery and human trafficking around the world. The principles contained within the Code of Conduct ensure that ethical, responsible, and humane behavior are integral to the day-to-day business operations at Sterling. The business culture and philosophies constituted by the Code of Conduct, and its universal application to all Sterling team members—internally, and in relations with vendors, clients, and partners—compel an environment that is constructive to the prevention and reporting of potential instances of Modern Slavery.

### Due Diligence

Sterling applies a risk-based approach to assessing our vendors' compliance with our applicable laws and regulations, anti-corruption and anti-bribery standards, global sanctions policies, privacy and data protection standards, and information security. Our Global Vendor Management Policy ensures that our vendors are properly vetted prior to engaging in business, and on an ongoing basis to ensure continued compliance with our zero-tolerance position on forced labor and human trafficking. Vendors are subject to an extensive due diligence process which evaluates them in the

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following ways: ensures the legitimacy and structure of their organization, identifies their locations, practices, operations, and relationships with other organizations, screens for legal and financial red flags, sanctions, litigation, regulatory violations, and ongoing investigations, and analyzes their policies and compliance programs. Likewise, thorough steps are taken in Sterling's Credentialing process for our clients to ensure they are legitimate, active, and registered legal entities that are subject to compliance with relevant laws and regulations. Clients must further attest to compliance with all applicable laws, Equal Opportunity Employment, Sterling's right to perform audits, and that our services will only be used for declared permissible purposes.

## Values and Policies


Sterling's core values include building trust and creating a safer world, coupled with our "It's all about people" philosophy. Policies and programs such Sterling's Code of Conduct, Global Ethics Hotline & Investigations Policy, Global Vendor Management Policy, and Global Sanctions Policy—among others—compel an environment that is constructive to the prevention and reporting of potential instances of Modern Slavery, internally and with our partners and clients. Our values, policies, and people-centric culture are aligned with the philosophical goals of the Modern Slavery Act, and keep Sterling consistently equipped to recognize, address, and communicate potential cases of forced labor and human trafficking.

## Training

All members of the Sterling team are held to high standards of quality and professionalism and are trained to ensure they can verify the identities of persons and the legitimacy of entities with which Sterling engages. Additionally, through training and experience, Sterling employees will remain well-equipped to identify fraudulent or stolen documents, noncompliance with relevant laws and regulations, and other red-flags which may indicate forced labor or the unwillful transportation of people.

## Ongoing Commitment

As new trends and risks emerge, Sterling will maintain our commitment to complying with the Modern Slavery Act, cooperating with the combatting of forced labor and human trafficking, and holding ourselves and our partners accountable in doing so.



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Steven L. Barnett

Director, Sterling (EMEA) Ltd.