

Public

MODERN SLAVERY ACT STATEMENT

OCTOBER 2019

This statement summarises the steps that Control Risks has taken to ensure that slavery and human trafficking are not taking place either within our business or in our supply chains. The statement refers to the financial year ending 31 March 2019, in accordance with Section 54 of the Modern Slavery Act 2015. It is made on behalf of Control Risks Group Limited, our UK entity, however this report reflects the global commitments and policy applicable to all entities across our group. It has been reviewed and approved by the Board of Directors of Control Risks International Limited (the group's holding company) which includes the Directors of Control Risks Group Limited.

Background

Control Risks is a specialist risk consultancy that helps to create secure, compliant and resilient organisations in an age of ever-changing risk. We work across the world from a network of [34 offices](#) and operate in accordance with shared standards and principles. Employing around 3,000 people from highly diverse backgrounds, we work with clients from the public, private and non-profit sectors. We have worked for clients from all industry sectors in more than 150 countries.

Our ethical commitment

Our [Code of Ethics](#) summarises our commitment to business integrity. Our [Human Rights Policy](#) provides further elaboration. The policy affirms that "Control Risks has zero tolerance for modern slavery and human trafficking". Furthermore, the company is "committed to implementing effective systems and controls to ensure that neither practice is occurring anywhere in its supply chains".

We have been a signatory to the UN Global Compact since 2007 and issue an annual Communication on Progress affirming our application of the Global Compact's ten principles, including with regard to labour rights.

Risk analysis

This is our third Modern Slavery Act statement and our approach to risk assessment in connection with our own operations continues to evolve. One early lesson was that we should focus not only on the obvious high-risk regions in developing countries but also on – for example – office cleaning services in industrialised economies. Partly prompted by the Act, we now have a greater awareness of the risk that providers of such services might employ migrant or otherwise disadvantaged workers who may be more vulnerable to exploitation and poor worker welfare conditions. This awareness has guided our ongoing risk reviews across our international network and has contributed to a tightening of our policies and procedures with regard to such services (see below).

The majority of our direct employees are trained professionals with specific skillsets and qualifications, meaning the issue of forced or child labour does not arise in our own operations.

Supplier Management Policy and Procedures

Our Supplier Management Policy states that the selection and management of suppliers must “minimise the risk of illegal, unethical or unprofessional behaviour” and specifically “where a supplier provides personnel to Control Risks it should have ethical employment practices”.

As part of our engagement procedures, we require suppliers of personnel to complete a “Labour Questionnaire” covering their own recruitment and employment practices, for example with regard to the payment of overtime and the availability of grievance mechanisms. We evaluate their responses carefully, drawing on the expertise of our own regional and subject matter specialists where needed.

Once selected, we require suppliers to commit to contractual obligations to comply with all applicable anti-slavery and human trafficking laws and our own Code of Ethics. Our contracts also include the right for Control Risks to audit.

Training

Our current internal human rights training course takes the form of eight videos followed by a short test. The training is available to everyone, and mandatory for all senior employees within internal corporate functions as well as all members of the following teams: Crisis and Security Consulting; Compliance, Forensics and Intelligence; Global Risk Analysis; Response and Cyber Security.

The first four videos explain our commitment to the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights. They then review the particular issues associated with security, human rights and labour. The labour-focused video includes reference to international labour conventions and the Modern Slavery Act, ensuring that our employees remain alert to these issues and understand their responsibility to escalate any concerns.

In accordance with our Client and Project Risk Management Policy, the fifth and sixth videos explain how our business teams should assess potential human rights concerns when taking on new clients and projects. The final two videos emphasise the need for continuous risk assessment in the course of our client assignments and explain how and when to report problems.

We encourage Control Risks employees to raise any ethical concerns, including with regard to labour welfare within our supply chains or amongst our direct employees. In the first instance, they can talk with their manager or a more senior manager within their department’s line management. Alternatively, if they prefer, they can make a confidential

report to our whistleblowing hotline run by an independent provider. As set out in our global policy, employees can be confident that they will not face any retaliation or detrimental treatment as a result of making a whistleblowing report.

Where appropriate, we will provide supplementary training to employees with specific responsibilities, for example with reference to the Supplier Management Policy.

We maintain a regular cycle of human rights training and the next round will take place in this 2019/2020 financial year.

Effectiveness

We have benchmarked our Modern Slavery Act policies and procedures with those of comparable professional service firms and judge that our approach is proportionate and effective in addressing the most salient risks that apply to our business. At the same time, we dare not be complacent and we are committed to the continued development of our approach to this important global issue.



Nick Allan

Global CEO, Control Risks
Director of Control Risks Group Limited