

Public

# MODERN SLAVERY ACT STATEMENT

OCTOBER 2020

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 2020, 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 from an international network of 36 offices across the world and operate in accordance with shared standards and principles. Employing around 2,800 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

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. However, we are alert to the potential risks

associated with services provided by our suppliers. Partly prompted by the Modern Slavery Act, we now have a greater awareness of the risk that providers of services such as office cleaners might employ migrant or otherwise disadvantaged workers who may be more vulnerable to exploitation and poor worker welfare conditions. This risk applies both in industrialised economies and - still more - in the emerging economies where many of us work. We address this risk through our Supplier Management Policy and Procedures (see below).

In the light of our reviews to date, we continue to assess that the specific risk of Modern Slavery linked to our own operations is low. However, in the year under review we embarked on a project to review and enhance our approach to Modern Slavery risk assessment across our operations. This will include the insertion of Modern Slavery risk as a standard entry on each office's risk register. Each Modern Slavery rating will be supported by a succinct written impact assessment. We will report on our progress in next year's Modern Slavery Statement.

## 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 and to terminate the relationship if the supplier is in breach of those obligations.

## Training

We maintain a regular cycle of human rights training. Our internal human rights training course is written by our in-house specialists, allowing us to focus on issues that are directly relevant to our operations. After watching a series of eight videos, employees complete a test to demonstrate their understanding. The training is available to everyone, and mandatory for all senior employees within internal corporate functions as well as all members of our service delivery and business development teams. The labour-focused section in the training refers 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 the year under review we introduced an additional element to our existing training portfolio by sharing a series of business integrity "dilemma scenarios" with all employees via e-mail. The objective is to raise awareness by presenting real-life ethical problems, where there may not necessarily be a right or wrong answer, and then inviting our colleagues to share proposed solutions. We wrap up the discussion with an e-mail summary of the range of responses as well as preferred approaches to solving the problem. At the same time, we highlight the internal resources that are available when needed. We are using this technique to promote discussion on a range of potential ethical concerns, including labour welfare issues. One of our scenarios involves a dilemma around migrant labourers during the COVID-19 pandemic.


We recognise the importance of enabling our employees to speak up about any ethical concerns, including with regard to labour welfare within our supply chains. Our global Whistleblowing Policy ensures that employees can be

confident that they will not face any retaliation or detrimental treatment as a result of raising a concern. If they do not feel comfortable talking with their manager, they can make a confidential report to our whistleblowing hotline. This hotline is run by an independent provider and facilitates anonymous reporting. The policy is easily accessible to all employees on our intranet and we raised awareness of the hotline in our mandatory training in the year under review.

Where appropriate, we will provide supplementary training to employees with specific responsibilities, for example with reference to the tools available for assessing labour risk. We anticipate that we will need to provide additional training to support our enhanced approach to Modern Slavery risk assessment (see above) and will report on this in next year's statement.

## 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 a process of continuous improvement in our approach to this important global issue.



Nick Allan

Global CEO, Control Risks  
Director of Control Risks Group Limited