

Modern Slavery Act Statement

October 2021

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 2021, 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 34 offices across the world and operate in accordance with shared standards and principles. Employing around 2,900 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. Like its predecessors, the latest edition highlights our work with clients on labour welfare issues as well as our own commitments to responsible employment practices in our own business and in our supply chain.

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. We pay particular attention to 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. We are conscious that this risk applies both in industrialised and in emerging economies: we address it through our Supplier Management Policy and Procedures (see below).

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".

To get a better understanding of who we might work with, we require suppliers of personnel to explain their own recruitment and employment practices via a bespoke questionnaire. This covers, for example, whether their workers pay fees as part of their recruitment process, the payment of sick leave or 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.

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We periodically organise internal meetings to raise awareness of this vetting tool and give employees an opportunity to ask questions and provide feedback on the process. These are valuable sessions and we invite managers from across the business to share their experience.

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. In the coming year we will review our communications with suppliers to ensure that they are absolutely clear on the ethical commitments that we expect, including with regard to labour practices.

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.

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 raise awareness of the hotline via our ongoing cycle of human rights and anti-corruption compliance training.

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. However, 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

