



MODERN SLAVERY STATEMENT

Owner: Sally McNair Scott; Date: 2017-10-01; Version:01.01; Classification: General

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 in April 2017 in accordance with Section 54 of the Modern Slavery Act 2015.

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 [37 offices](#), and operate in accordance with shared standards and principles. Employing around 2,500 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, and makes specific reference to Modern Slavery. Control Risks will not tolerate or condone the abuse of human rights within any part of the organisation or its associated supply chain.

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

Risk analysis

In our capacity as a professional services firm, we judge that the risk of slavery or human trafficking existing within our own business is low. However, in response to the Modern Slavery Act, we have been reviewing the risk of slavery or other forms of labour malpractice within our supply chain. Our assessment has been informed by the Global Slavery Index. At the same time, we recognise that modern slavery can exist in any jurisdiction. We have placed a particular focus on our relationship with suppliers of personnel such as cleaning or driving services. We are committed to strengthening our controls, again with particular reference to suppliers of personnel.

Supplier Management Policy and Procedures

In the coming year, we will introduce a revised Supplier Management Policy, together with the associated procedures. We already require our suppliers to abide by the principles in our Code of Ethics, including respect for human rights and full compliance with local labour laws. The revised procedures provide for closer vetting of suppliers that are associated with higher human rights risks, especially if they provide personnel to work on Control Risks' behalf. We ensure that supplier contracts contain appropriate provisions, including the right to audit.

Training

We are currently preparing a new human rights training package based on a set of eight videos designed specifically for Control Risks, and including particular reference to the Modern Slavery Act. The training is intended to raise

awareness of the kinds of human rights risk that could occur in relation to our business. It highlights the requirement for Control Risks employees to report to senior management if they become aware of any actual or suspected abuses that might be linked to our company. Where appropriate, we will provide supplementary training to employees with specific responsibilities, for example with reference to the Supplier Management Policy.

A handwritten signature in blue ink, appearing to read 'Sally McNair Scott', written in a cursive style.

Sally McNair Scott

General Counsel

1 October 2017