



# HUNTSWOOD

## MODERN SLAVERY STATEMENT 2019

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### OUR BUSINESS MODEL AND SUPPLY CHAIN

Huntswood CTC Ltd ('the Company') aims to drive better outcomes - for our clients and their customers.

We achieve this by combining expertise, technology and operational services to deliver practical solutions that help regulated firms deliver high quality services in a cost-efficient way, while effectively mitigating business risk.

Because our requirements can range from IT hardware to secure waste disposal services, we rely on a diverse range of suppliers to perform our work. As well as this, the nature of our business means we are also suppliers ourselves, as we provide a range of resourcing solutions to our clients.

### OUR POSITION ON MODERN SLAVERY AND HUMAN TRAFFICKING

The Company is committed to conducting business in an honest, transparent and ethical manner, as well as having a zero-tolerance approach to modern slavery and human trafficking both within the Company and across our supply chains.

We have, and will continue to take steps to ensure that slavery and human trafficking is not taking place within our supply chain.

### POLICIES AND AWARENESS OF MODERN SLAVERY

The Company has published a Modern Slavery Policy which is available for all employees of the Company. In addition, we have a Procurement Policy and a Supplier Governance Policy which set out our approach to the engagement, ongoing governance and management of supplier relationships. Employees who are involved with engaging and managing suppliers are required to read and indicate to the business that they understand the significance of modern slavery and how the company works to minimise its exposure to this risk.

The Company encourages a free and open culture in its dealings and all people with whom it engages in business and legal relations. As such, we ensure that all employees are familiar with our Whistleblowing Policy, which encourages employees and our associates to report any malpractice that they feel goes against our standards or results in failure to comply with legal obligations.

All disclosures are investigated, followed up by appropriate actions and treated in the strictest confidence.

### ACTIONS WE'VE TAKEN TO MINIMISE OUR RISK

#### **Employee and Associate Engagement and Governance**

As the Company acts as a supplier of people to its clients, we understand that the biggest area of potential exposure to modern slavery is in the recruitment area of our business.

We have therefore taken the responsibility of ensuring that we do not expose our clients to any risk relating to modern slavery or human trafficking in our supply chain. As a result, the Company has a stringent people screening process for the engagement of all our employees, temporary contractors and associates which ensures that we are minimising our risk to exposure to human trafficking.

Associates are engaged as suppliers through a contract for services. Where they are engaged via an 'umbrella' company, a due diligence exercise is performed to ensure that they adhere to appropriate legislation which includes human rights and slavery.

### **Supply Chain – Engagement and Governance**

We view audits as an essential part of our supplier management process; during 2018/19 we have continued to utilise our due diligence process for new and existing suppliers, with a detailed questionnaire that includes a series of questions relating to the supplier's policies addressing modern slavery and trafficking.

We have reviewed and undertaken ongoing risk assessments of our suppliers, considering both the risk of violations and commercial relevance. Where we consider there to be an elevated risk, suppliers have been asked to complete a detailed questionnaire and provide evidence of their compliance to the Act. We have met with those suppliers and have had face-to-face discussions about how they intend to minimise their risk to modern slavery in their supply chain and to ensure that they are meeting the requirements of the Act. We will continue to do this every 3 years for existing suppliers.

The Company's 'Due Diligence Questionnaire' has been updated to be more robust and ensure we are asking a full suite of questions when we look to engage with a new supplier. It now includes an increased amount of general information covering both UK and non-UK entities and confirmation on compliance with any cross-country sanctions. Something we are more mindful of as we look to potentially move into outsourcing some of our work abroad on future engagements.

We will continue to monitor where we can improve the process and contractual requirements of suppliers and make changes where we are able.

## **IN SUMMARY**

Huntswood understands that modern slavery is not static and we will continue our efforts to mitigate the risk in the year ahead.

Longer-term, we will continue to look to improve ways of measuring the effectiveness of our risk management and will give an update on our next statement.

**MARTIN DODD**

CHIEF EXECUTIVE

23 October 2019



 HUNTSWOOD