

Modern Slavery Act Statement

October 2023

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 2023, 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.

This statement is published on our website controlrisks.com and uploaded to the UK government's modern slavery statement registry. It follows a similar format to our previous statements but contains additional information on our policy framework as well as briefly outlining future implementation plans.

Our business and supply chains

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 offices on every continent and operate in accordance with shared standards and principles. Employing around 4,000 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.

In general, our supply chains are those providing goods and services to facilitate the operation of our offices or providing services to support the delivery of our client services.

Policies

Code of Ethics

Our [Code of Ethics](#) summarises our commitment to business integrity. It affirms that we have zero tolerance for modern slavery and human trafficking. We expect our suppliers to provide a decent working environment for their own employees in accordance with the International Labour Organisation (ILO) core conventions.

Human Rights Policy

Our [Human Rights Policy](#) provides further elaboration on the full range of our human rights commitments. It reminds our employees that we must assess the risk that Control Risks' activities could – directly or indirectly – contribute to human rights abuses before accepting a new client or assignment. Furthermore, the

company is “committed to implementing effective systems and controls” to ensure that modern slavery is not occurring anywhere in its supply chains.

Supplier Management Policy

We maintain a global Supplier Management Policy that builds on our Human Rights Policy, focusing on how to implement those principles in our supplier relationships. It 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” (see the due diligence section below).

Third Party Code

In the year under review, we initiated the process of drafting a Third Party Code: this will be finalised in the current financial year and will be the key reference point concerning the standards we expect of our suppliers. Currently, we require our suppliers to comply with our Code of Ethics which is written for an employee audience. To enhance our engagement with third parties on these matters we are drafting the Third Party Code to address them directly. In line with the ILO core conventions, we expect our third parties to respect workers' freedom of association, pay fair wages, and avoid malpractice, for example in the recruitment and management of migrant workers, and institute grievance mechanisms. Similarly, we expect them to assess and take steps to minimise the risk of modern slavery in their own supply chains.

Whistleblowing Policy

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

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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. In the year under review, we did not receive any whistleblowing reports relating to modern slavery.

External grievance procedure

We are always ready to listen to anyone outside the company who wishes to raise a concern, make a complaint, or express a grievance relating to our ethical conduct, including with regard to modern slavery. We publish details of our [Grievance Process](#) on our external website. External parties who wish to raise concerns are encouraged to contact one of our employees directly or to make contact with us via a designated [email address](#). We publish information relating to our Grievance Process in Iraq in English, Arabic and Kurdish on a separate [webpage](#) on our external website.

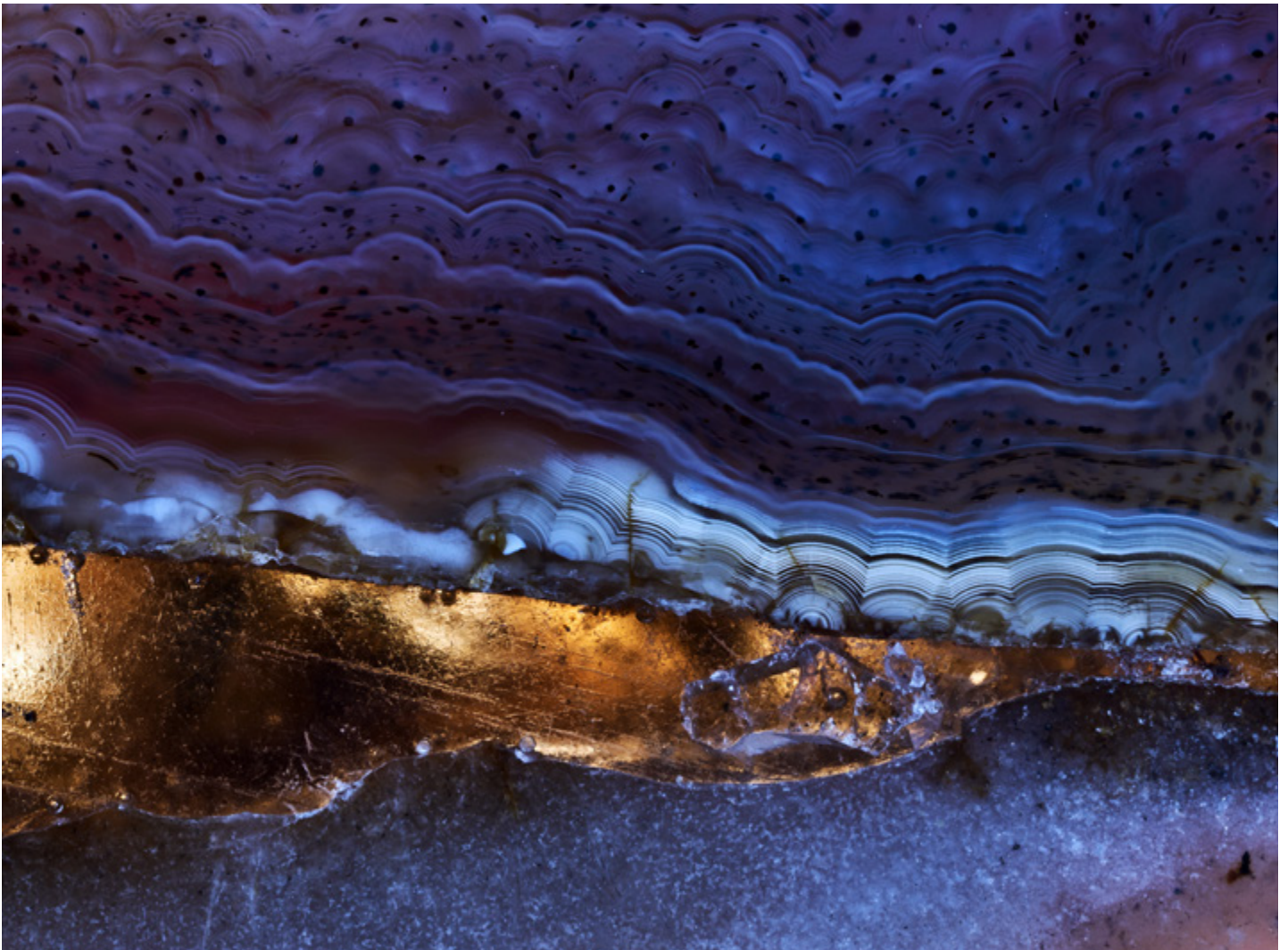
Risk analysis

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 the risks relating to the supply of personnel apply both in industrialised and in emerging economies: we address them through our Supplier Management Policy and procedures (see above), including our approach to due diligence.

Due diligence

At the selection stage, we require suppliers of personnel to explain their own recruitment and employment practices via a questionnaire. This process was developed by our own subject matter specialists and is tailored to our business. It covers, for



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example, whether workers pay fees as part of their recruitment process, the payment of sick leave or overtime and the availability of grievance mechanisms. We emphasise that employees should discuss any concerns with their managers as part of these vetting procedures.

Our vetting procedures are calibrated according to the levels of risk associated with different categories of suppliers, drawing on their answers to our questionnaires and conducting external enquiries where appropriate. 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 (in future we will refer to our Third Party Code). 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 event that a breach by a supplier is identified, we will work closely with our in-house specialists to guide our response; protecting the interests of those workers affected is a key concern.

Training

We implement 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. It is important that our employees can recognise any potential problems in relation to the suppliers that they interact with; we encourage our employees to remain alert and to escalate any concerns, either directly to their managers or through the whistleblowing function.

To reinforce our training and encourage discussion we circulate ethical dilemmas by email, inviting our employees to vote on the best course of action and share their thoughts on the scenario. This initiative is successful in bringing our policies to life. When closing the discussion, we share (anonymously) any particular feedback from colleagues which raised key points to learn from. In the period under review, the dilemma focused on employment practices in a fictional office cleaning agency; employees considered the use of our whistleblowing hotline and how to protect the interests of the agency's staff.

Enhancing 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. In particular, we are in the process of reviewing our human rights and modern slavery risk assessment procedures and will report on our progress in our next statement. In the course of the current financial year, we will also introduce our new Third Party Code (see above).

We have been a signatory to the UN Global Compact since 2007 and issue an annual **Communication on Progress** (COP) affirming our application of the Global Compact's ten principles, including with regard to labour rights. Like its predecessors, the 2022 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. The Global Compact's digital platform has experienced technical problems which has delayed the submission of all participants' COP reports: we expect our 2023 COP to be posted by December 2023. Our reporting will follow the Global Compact's revised COP format, including new indicators relating to labour welfare in supply chains.

Nick Allan

Global CEO, Control Risks

Director of Control Risks Group Limited