



# HUNTSWOOD

## MODERN SLAVERY STATEMENT 2022

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### OUR BUSINESS MODEL AND SUPPLY CHAIN

Huntswood CTC Ltd, HUSP Limited, Huntswood Resources Limited, Huntswood Scotland Limited and Customer Experience People SA (Pty) Ltd (“Huntswood Group”) aim to drive better outcomes for their clients and their customers.

The Huntswood Group achieves 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, the Huntswood Group relies on a diverse range of suppliers to perform its work. As well as this, the nature of its business means the Huntswood Group is a supplier, providing a range of resourcing solutions to its clients.

### OUR POSITION ON MODERN SLAVERY AND HUMAN TRAFFICKING

The Huntswood Group 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 Huntswood Group and across its supply chains.

The Huntswood Group have and will continue to take steps to prevent slavery and human trafficking taking place within its supply chain.

### POLICIES AND AWARENESS OF MODERN SLAVERY

The Huntswood Group has published a Modern Slavery Policy which is available for all employees. In addition, it has a Procurement Policy and a Supplier Governance Policy which set out the approach taken 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 that they understand the significance of modern slavery and how the Huntswood Group works to minimise its exposure to this risk.

The Huntswood Group encourages a free and open culture in its dealings and all people with whom it engages in business and legal relations. As such, it ensures that all employees are familiar with its Whistleblowing Policy, which encourages employees and associates to report any malpractice that they feel goes against its 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 Huntswood Group acts as a supplier of people to its clients, it understands that the biggest area of potential exposure to modern slavery is in the recruitment area of its business.

The Huntswood Group have therefore taken the responsibility of ensuring that it does not expose its clients to any preventable risk relating to modern slavery or human trafficking in its recruitment process. As a result, the Huntswood Group has a stringent people screening process for the engagement of all its employees, temporary contractors and associates which ensures that the risk of exposure to human trafficking is minimised.

### Supply Chain – Engagement and Governance

The Huntswood Group views audits as an essential part of its supplier management process; during 2021/22 the Huntswood Group have continued to utilise its due diligence process for new and existing suppliers. The Huntswood Group's 'Due Diligence Questionnaire' ensures it is asking a full suite of questions when it looks to engage with a new supplier. It includes questions that allow for the collation from all suppliers on general information covering both UK and non-UK entities, how the supplier may work cross-border and confirmation on compliance with any cross-country sanctions. Something the Huntswood Group are more mindful of as it expands its capability to provide some services from overseas offices where required. In addition, it incorporates a series of questions relating to the supplier's policies addressing modern slavery and trafficking.

The Huntswood Group have reviewed and undertaken ongoing risk assessments of its suppliers, considering both the risk of violations and commercial relevance. Where it considers there to be an elevated risk, suppliers have been asked to complete a detailed questionnaire and provide evidence of their compliance to the Act. The Huntswood Group schedule virtual meetings to discuss how the suppliers intend to minimise their risk to modern slavery in their supply chain and to ensure that they are meeting the requirements of the Act. The Huntswood Group will continue to do this every two years for existing suppliers.

The Huntswood Group will continue to monitor where and how it can improve the process and contractual requirements of suppliers and make changes where able to do so.

## IN SUMMARY

The Huntswood Group understands that modern slavery is not static, and it will continue its efforts to mitigate the risk in the year ahead.

Longer-term, the Huntswood Group will continue to look to improve ways of measuring the effectiveness of its risk management in this ever-changing landscape.

**MARTIN DODD**

CHIEF EXECUTIVE

1 December 2022



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