



# HUNTWOOD

## MODERN SLAVERY STATEMENT 2017

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### OUR BUSINESS MODEL AND SUPPLY CHAIN

Huntswood is the UK's leading specialist resourcing and consultancy firm focused on governance, risk and compliance in the areas of regulatory conduct and financial crime.

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 recruitment services for clients to fill technical and customer service roles.

### OUR POSITION ON MODERN SLAVERY AND HUMAN TRAFFICKING

Huntswood 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 Huntswood 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

Huntswood have published a Modern Slavery Policy which is available for all Huntswood employees. In addition, we have a Supplier Engagement and Governance Policy which sets out our approach to the engagement, ongoing governance and management of supplier relationships. Employees 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.

Huntswood 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

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

As Huntswood 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, Huntswood has a

stringent quality assurance process for the engagement of all our employees 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 2016/17 we have introduced a new due diligence process for new suppliers, with a detailed questionnaire that includes a series of questions relating to the suppliers policies addressing modern slavery and trafficking.

We've reviewed and undertaken a further risk assessment of all 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 monitor where we can improve the process and contractual requirements of suppliers and make changes where we are able. We intend on amending our supplier engagement contractual terms and conditions to include compliance with the Modern Slavery Act; any breach of these terms will result in appropriate actions which may include termination of contract.

## **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 look at better ways of measuring the effectiveness of our risk management and will give an update on our next statement.



**Mark Humphries**

**CHIEF EXECUTIVE**

**13 September 2017**

