

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Introduction

This policy statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Concertus has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern Slavery and Human Trafficking Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, seconded workers, volunteers, agents, contractors and suppliers. Concertus strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Concertus has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

We expect that our suppliers will hold their own suppliers to the same high standards.

Commitments

Concertus expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We take a risk-based approach to our contracting processes and keep them under review.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Anti-Bullying and Harassment Policy: We operate the anti-bullying and harassment policy alongside our grievance procedure for any employee which has concerns regarding their treatment whilst working for Concertus.

Consistent with our risk-based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to adhere to our modern slavery policy.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere our Modern Slavery Policy.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Modern slavery policy.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

Our Suppliers

Concertus operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

This statement was approved by the Managing Director.

Andrew Rowe

16.12.2019