

Anti-Slavery and Human Trafficking Policy – CRP-GL-LC-PCY-013

Introduction

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Penspen has a zero-tolerance approach to modern slavery across all areas of our organisation, as well as in our supply chains. Penspen is committed to ensuring that it is not connected to modern slavery in any way. Penspen is determined to ensure that its business operates in an open and transparent way.

Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

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. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Commitments

Penspen 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 are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our policy, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk based approach we may require:
 - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our policy
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the 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 the 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

Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Due Diligence

As a professional services organisation we deliver our services through our high-quality staff and as such we have robust recruitment practices supported by representatives of our Human Resources Team in each region in which we operate. Checks include evidence to support candidates' 'right to work'. This close involvement and oversight limits the risk of employing anyone who is forced or trafficked labour.

Where we have sub-consultants or contractors providing services on our behalf we require them to comply with our terms which include reference to the procedures and practices outlined.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might

lead to, or suggest, a breach of this policy. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our organisation or supply chains at the earliest possible stage.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Whistleblowing

We encourage the reporting of any wrongdoing through internal and external whistleblowing procedures. These procedures also contain arrangements to ensure the protection of whistleblowers.

Suppliers

Penspen works in partnership with contractors, suppliers and other business partners to ensure that they share and work towards our opposition to slavery and human trafficking. To manage this, as part of our contracting processes, we include specific prohibitions on the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our suppliers to hold their own suppliers to the same high standards. We check that new suppliers, where required, have published their own modern slavery statement.

We have, and are improving, our arrangements to identify and manage potential risk areas in our supply chain and to work with them through requiring their compliance with the Modern Slavery Act and building long-standing relationships with them.

We are committed as an organisation to tackling modern slavery and human trafficking and want to work with suppliers who share our values. To ensure contractors and those in our supply chain comply with our values, we include standard clauses in sub-contractor/sub-consultant contracts. In addition, we have a compliance team, which involves members of the legal, people and finance departments.

Board Approval

This statement has been approved by the EXCOM Plc who will review and update it annually.

This statement is made pursuant of section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019.

Signed:



Peter O'Sullivan
CEO
The Penspen Group Limited