

## **Anti-Slavery and Human Trafficking Policy**

### **Policy statement:**

This policy applies to all persons working for us or on behalf of our Controlaccount in any capacity, including employees at all levels, Directors, agency workers, volunteers, agents' contractors and suppliers. We shall be a Company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery.

Controlaccount considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property, being physically constrained or to have restriction placed on freedom of movement

Controlaccount is based in the UK and offers Order to cash credit management and business outsourcing solutions.

Controlaccount acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Controlaccount understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

We are committed to acting ethically and with integrity and transparency, in all business dealings. 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.

The labour supplied to Controlaccount in pursuance of our operations is wholly carried out in the United Kingdom. No labour provided to Controlaccount in the pursuance of its own services is obtained by means of slavery or human trafficking.

Controlaccount does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to have involved itself in slavery, servitude and forced or compulsory labour.

### **Our Supply Chains;**

In order to fulfil its activities, the main supply chains of the business include those related to outsourced litigation and related services, telecoms and general office equipment (including stationary). All suppliers have access to our code of conduct and key suppliers have a supplier evaluation questionnaire completed and are assessed to ensure they will adhere to our high standards.

**Potential exposure;**

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist externally to the company through suppliers not adhering to our code. As such any supplier who is found during the course of trading to not adhere to our standards, will have their relationship terminated immediately.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

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 through communication of our policies:
- We operate a strict 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.
- 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.
- Our Code of business conduct policies including our Corporate and social responsibility policy and through our Compliance Plan ensures an enforcement of compliance and discipline in our workplace activities.
- We take a risk-based approach to our contracting processes and keep them under review.
- Controlaccount 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 due diligence 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 Code of Conduct, 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 Code of Conduct.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code.
- 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 Code of Conduct.

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.