

Prepared by: Stuart Metcalf

Issue date:

January 2019

Reviewed by: Alan Edwards

Version:

Final

## INTRODUCTION

This statement is made in compliance with s.54 of the Modern Slavery Act 2015 and sets out the steps taken by SLR Global Limited and its UK subsidiary SLR Consulting Limited ("**SLR**") during the financial year ending 31 December 2018 to prevent slavery and human trafficking from taking place in any part of its business, including its supply chain and the ways it has sought to minimise the risks of any association with practices which undermine the principles of safety and dignity for its customers, employees and business partners

### About SLR/ Organisation Structure

SLR is an independent, environmental and strategic advice consultancy with a reputation for providing high quality tailored services.

SLR Global Limited is the parent company of the SLR group. You can find out more information about our group structure at <http://slrconsulting.com/company-structure>.<sup>1</sup>

SLR employs approximately 400 staff across 22 offices located in England, Wales, Scotland and Northern Ireland. You can find out more about what we do at <http://slrconsulting.com/about>.

As a provider of consultancy services we do not have a particularly long or complex supply chain – our main suppliers are providers of niche services such as specialist technical sub-consultants, drilling and lab testing companies, office supplies, IT services and equipment and facilities management. The vast majority of our supply chain is based in the UK, and the occasions where suppliers from high risk countries may be considered are minimal. Based on this assessment, we do not consider that we operate in any industry or sector which is particularly susceptible to labour exploitation or other forms of slavery and human trafficking, but we are nevertheless committed to preventing these practices from occurring within both our business and our supply chain.

### Philosophies and Principles

SLR is proud of the ethical approach and standards that it has developed over many years and believes that these standards are consistent with the underlying principles of the Modern Slavery Act 2015. Our culture is built on trust and openness and the aiding, abetting, counselling or procurement of forced labour and human trafficking would not be tolerated under any circumstances.

SLR adopts and operates a 'one team' culture with extensive communication and interaction between all parts of the group. We believe this approach helps us to establish and nurture a culture of trust that fosters and embraces openness whereby all individuals feel safe to discuss their opinions, views and/or concerns without fear of reprisal, subsequent discrimination or disadvantage. We treat all employees, contractors, shareholders, suppliers, clients and any member of public with whom we come to contact, with respect.

<sup>1</sup> This statement sets out the steps taken by SLR Global Limited and SLR Consulting Limited each of which fall within the scope of section 54(2) of the Modern Slavery Act 2015.

## Relevant Policies

SLR is primarily a “people business” and depends upon its highly qualified and specialised staff to provide multidisciplinary advice on a wide range of strategic and site-specific environmental and sustainability issues. SLR realises that slavery and human trafficking can occur in many forms such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse, but due to the specific nature of our business, we believe that there is a low risk of these sorts of practices occurring in our business and supply chain. This risk is further mitigated by SLR’s culture and policies as outlined below. SLR has developed a business conduct management framework which describes how the various elements of our activities are aligned to deliver our commitment to operate in a manner which is ethical and equitable to all our stakeholders, including compliance with the Modern Slavery Act. There are clear, global policies in place within SLR which demonstrate and support our commitment to combating modern slavery, which include as follows:

- **Business Conduct Policy** – Adoption and acceptance of this policy is mandatory for all SLR staff, and the policy states that SLR will not engage in business with any contractors/sub-contractors, sub-consultants, suppliers or agents who are not able to demonstrate a similar commitment to that of SLR in operating in a fair, honest and equitable manner.
- **HR Policy and Employee Code of Conduct** - SLR's HR Policy and Employee Code of Conduct make clear to employees the standards of conduct and behaviour expected of them when representing SLR. We strive to maintain the highest standards of employee and supply chain conduct and ethical behaviour when undertaking projects, in particular in different jurisdictions or cultures, and are in the process of reviewing our guidance with a view to including more specific modern slavery initiatives in relation to the identification and management of risk by our employees.
- **Whistleblowing Policy** - SLR operates a whistleblowing policy which encourages all its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or of its supply chain. This includes any circumstances that may give rise to any unethical practices or behaviours, including enhanced risk of slavery or human trafficking. SLR's whistleblowing procedure is designed to make it easy for workers or business partners to make disclosures, confidentially and without fear of reprisal, which we hope will contribute to identifying any potential risk of modern slavery and/or human trafficking occurring within our business or supply chain.
- **HR Policy and Recruitment** - SLR either recruits individuals directly or uses a list of pre-approved agencies with whom it has a written contract, and who share SLR's professional and ethical approach to recruitment. SLR seeks to verify the practices of each of these agencies before a contract is agreed and the agency is engaged on any recruitment assignment, whether it is of a permanent or temporary nature. This includes seeking contractual assurances that the agency ensures its candidates are paid at least the applicable national minimum wage in the country in which they are engaged.
- **Supplier Approval Procedures** – all new suppliers are required to complete questionnaires before being included within SLR’s supply chain. This process has recently been updated and extended to

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include more ethical considerations, including in relation to business conduct and combating modern slavery. Please see the section on due diligence and managing risk below.

- **Living Wage** – the majority of our employees are paid above the Living Wage (which is above the government determined minimum wage) which shows a commitment to avoiding labour exploitation within our own business.

All policies and procedures of SLR are regularly assessed at least annually and periodically updated against best practice.

### Due Diligence/Managing Risk

- SLR does not wish to be associated with any organisation that either has or is found to be involved with either human trafficking or modern slavery. If we were to find evidence that one of our suppliers has failed to comply with the Modern Slavery Act 2015, then we would require the relevant supplier to remedy such non-compliance and we would consider terminating our relationship should we see no substantial improvement in the way their business is conducted.
- During 2018, we reviewed our Supplier Approval Procedures and with effect from the start of 2019, are introducing a new supplier questionnaire, which incorporates a requirement for all suppliers to comply with their own UK Bribery Act compliant policy or SLR's Business Conduct Policy, National Minimum Wage Regulations and the Modern Slavery Act 2015. Where appropriate, copies of their own policies will be sought from the suppliers so that we can review their procedures for complying with SLR's requirements. In addition, our standard sub-contractor engagement contracts require suppliers to commit to complying with our Business Conduct Policy. By extending these commitments beyond our own employees we are helping to improve standards and working conditions throughout our supply chain, and SLR will provide adequate resources, training and investment to ensure its successful application throughout the next financial year.

### Training and Key Performance Indicators

Given our view that SLR's exposure to modern slavery risk continues to be very limited, we consider our existing due diligence and other processes to be sufficient and appropriate for this level of risk. However, should circumstances arise which we consider may be particularly high risk, appropriate training will be developed and targeted at those personnel who may have direct exposure. This approach will be reviewed periodically by the directors and senior management.

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## Board Approval

This statement has been approved by the board of directors of both SLR Global Limited and SLR Consulting Limited, who will review and update it as necessary on an annual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes both SLR Global Limited's and SLR Consulting Limited's slavery and human trafficking statement for the financial year ending 31 December 2018.



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**Alan Edwards**

European Regional Manger

SLR Consulting Ltd

**January 2019**

Next review: Jan 2020