

## MODERN SLAVERY & HUMAN TRAFFICING STATEMENT 2019

Modern slavery is an international crime affecting up to an estimated 46 million people around the world. This growing global issue transcends age, gender and ethnicities. It includes victims trafficked from overseas and vulnerable people in the UK who are forced illegally to work against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

This statement is made on behalf of Picket Post Consulting Limited pursuant to section 54(1) of the Modern Slavery Act (the Act) which requires commercial organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual 'Slavery and Human Trafficking Statement' and whilst we are not yet at this level we have decided to voluntarily publish our statement

Picket Post has assessed and addressed anti-modern slavery laws within our own business, and we expect organisations with whom we work also to adopt and enforce policies to comply with the legislation. Collaboration is at the heart of achieving this with our team, suppliers and clients.

### OUR BUSINESS

We manage our business through a single legal entity governed by our Board of Directors and our CEO Andrew Lovell takes personal responsibility for our Equality and Modern Slavery policies.

We operate a zero-tolerance approach to Modern Slavery and are committed to ensuring that there is no modern slavery or trafficking in our business or in our supply chain. Our policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws. We have created procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the legislation.

We have defined standards on how we expect our Team and Suppliers to behave with both colleagues and clients. Our workplace and business environment is founded on trust, openness, and transparency. We will also continue to support our team, suppliers and clients to address issues arising from modern slavery.

### TRANSPARENCY IN OUR HIRING AND SUPPLY CHAINS

We hire people to our Team directly in the UK, but our business is exposed to greater risk when dealing with our suppliers, particularly those who have operations and suppliers in other territories.

- For UK hires we adhere strictly to all UK employment laws and provide a free space without encumbrances during the hiring process for us to confirm with the potential hire on a 1-2-1 basis that they have not been trafficked or subject to modern slavery.
- We have a responsible purchasing policy in place and our commitment is to work closely with our suppliers to set an ethical supply chain policy in place with a defined code of conduct stating our business' intention to step away (without penalty) if any instances of modern slavery are discovered and/or ignored. Where existing contracts are in place we will seek to replace them with these terms included when they are due for renewal or by negotiation before the end of the 2020 financial year. All new major supplier contracts will include these clauses.

- We have and will continue to have systems in place to:
  - Identify inappropriate employment practices.
  - Identify and assess other risk areas.
  - Mitigate the risk of slavery and human trafficking occurring.
  - Monitor potential risk areas.
  - Protect whistle-blowers.

## MEASUREMENT

We will select a minimum of 25% of our supply chain at random each year to audit for compliance to the Act. Audits will consist of a mix of supplier reviews, onsite audits, and self-certification declarations.

## TRAINING

To confirm that we have continuing understanding of the risks of modern slavery and trafficking in our business, our team, and suppliers, we will provide relevant annual training to our team.

This statement constitutes our declaration for the financial year ending May 2020 and has been approved by our CEO on 30<sup>th</sup> July 2019.



Signed by Andrew Lovell, CEO Picket Post Consulting Limited.

30/7/2019.