

**Salterton Associates Limited Modern Slavery Act Statement for 2019- 2020 and plans for 2020-2021**

**General principles:**

Modern slavery refers to any activity that impinges human freedom through servitude, forced and compulsory labour, and human trafficking. Salterton Associates Limited (Salterton) is committed to playing its part in helping to prevent any incidence of modern slavery in its business and supply chains. We expect the same level of commitment from all of our business partners, suppliers and contractors, and to do the same within their respective supply chains. In accordance with the Modern Slavery Act, this statement describes the actions Salterton has taken during the tax year ending 5 April 2021 to mitigate the risk of modern slavery and human trafficking taking place in our business operations or supply chain, as well as our approach to the issue in 2021-2022.

Our commitment, in 2019-2020 has focused on:

- assessing modern slavery and human trafficking risks within our business and supply chains;
- developing risk mitigation strategies in line with the individual risk profiles of the business activities;
- reviewing our approach to due diligence and ongoing monitoring of our Associates and those contracted to perform work on our behalf; and
- raising awareness via communications, training and guidance to clearly outline our expectations of our employees.

Our operations are based in the UK but extend to other regions of the world, with concentration presently on the Caribbean Region. We supply expert advice, investigative and other resource to undertake investigations and support security, police and related infrastructure. Our activities will expand in 2020-21 and our approach to education, monitoring and enforcement of our principles will be cemented as we develop our business.

**Our approach to acting responsibly in our business:**

Our business does not presently fall within the category required to publish a Modern Slavery Statement. We are, however, committed to identifying, investigating and eliminating any possibility of ourselves or anyone in our supply chain from knowingly or otherwise participating to any extent in modern slavery.

All of our associates and sub-contractors are vetted to guarantee compliance. The same approach applies to larger businesses with whom we contract to perform specialist services. All of our associates and contractors receive remuneration that is significantly in excess of the UK living wage and are free to contract with other parties at any time without contractual restriction. We expressly prohibit labour abuses, such as forced labour and child labour, as well as corruption and bribery.

**Our Business Standards:**

Our employees, associates and sub-contractors are committed to doing the right thing, so:

- following the law;
- operating in accordance with our values; and
- supporting and enforcing our prohibition against use of forced labour, child labour or human trafficking in any part of our operations.

Any employee, associate or sub-contractor who do not adhere to our standards would face appropriate disciplinary action. In addition, our responsible procurement policy requires our business partners, including suppliers and contractors, to act in accordance with Salterton's business values and standards.

We require all suppliers to adhere to the United Nations Universal Declaration of Human Rights, act in accordance with the Ten Principles of the UN Global Compact. Their standards are expected to be consistent with regard to environmental, social and ethical matters, including protecting against labour abuses (e.g., forced labour, slavery and child labour).

**Assessment of modern slavery and human trafficking risks:**

We have undertaken a risk assessment to fully understand our profile and what needs to be done to mitigate modern slavery and human trafficking risks in our business and supply chain. Our Directors have overall responsibility for the oversight of risk management generally and, particularly with regard to Modern Slavery.

We recognise that human rights violations can take place in our sector of operations and in any country. We are committed to playing our part to help eliminate it.

**Mitigating risk:**

We remain small enough to personally monitor the terms and operating basis of each contract, associate and sub-contractor. We have ensured all our decision-makers are aware of modern slavery risks and what action they are required to take. We have identified increased risk in certain parts of the world and apply appropriate diligence.

**Due diligence and supply chain control:**

Our due diligence and supply chain controls seek to ensure we only engage with business partners, including contractors and suppliers that are reputable and share our commitment to playing our part in the fight against modern slavery and human trafficking. Salterton pre-screens all contractors and suppliers before asking them to participate in any contract negotiations. This helps to ensure compliance with our standards – including with regard to modern slavery issues. We require assurance of compliance with any local labour and employment laws, including all anti-slavery and anti-trafficking legislation, including the Modern Slavery Act and/or equivalent national legislation.

**Our supply chain:**

Salterton works with a variety of suppliers annually, the majority of which are currently based in the UK. These are bound by the same human rights legislation as we are ourselves. We ensure all our suppliers commit to our standards and we expect them to implement effective systems and controls to ensure that slavery and human trafficking do not take place. Although we are a relatively small corporation, we still have an opportunity to influence the behaviours of those with whom we work and contract, increase awareness and compliance of Modern Slavery legislation and good practice, as well as our collective impact on the environment. We will not knowingly accept services from suppliers who present a risk of exploitation of either people or natural resources.

We are committed to reviewing the effectiveness of our due diligence to enhance its effectiveness. Our contract terms require suppliers and contractors to comply with all applicable local laws, including applicable modern slavery and human trafficking laws. Should any instances of modern slavery or human trafficking come to light, contracts with suppliers and contractors are likely to be terminated. Whilst we have not had any reported incidents to date, we are not complacent and are committed to maintain our diligence in monitoring contract performance for adherence.

**Contractors**

The vast majority of persons undertaking work on Salterton's behalf are small businesses and other individuals acting as sub-contractors. Each of these is required to commit to our standards. Relevant factors, include that:

- no individual worker is charged unnecessary fees, for example for administering payroll services or National Insurance contributions;
- no person's original identification, including passports, are held by anyone other than the worker;
- resignation by individuals is voluntary, without penalty; and
- no restrictive covenants restrict the opportunity to undertake future work for other parties.

We monitor our performance and those of our contractors to ensure these standards are met. Training is key to our efforts to eliminate modern slavery and associated risks from our business and supply chains.

**Whistleblowing:**

Salterton's whistleblowing contact email allows employees, sub-contractors and others to raise concerns about any serious wrongdoing anonymously. This includes any concerns relating to modern slavery and human trafficking within the business or our supply chains. Our whistleblowing policy makes it clear that whistleblowers must not suffer any detrimental treatment of any kind as a result of raising any legitimate concern. By the term 'detrimental treatment', we mean termination of a contract, disciplinary action, threats of any kind or any other unfavourable treatment. The whistleblowing system is promoted via our website and training

This statement covers the date of incorporation of Salterton Associates Limited (24 December 2020) to 5 April 2021. The following statement will cover the period 6 April 2021 to 5 April 2022.

Salterton Associates Limited  
6 April 2021