 

Modern Slavery

Policy and Process



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# Introduction

This policy is made on behalf of P2 Consulting and is informed by section 54(1) of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement.

P2 Consulting is not obliged under legislation to set out a Modern Slavery statement (as the company falls below the thresholds under which one is obligated), however the company still publishes this statement as:

* + Many of the client organisations with which we work are obliged to publish a statement, and routinely enquire as to our position
	+ We are supportive of the principles of the Act, and therefore seek to act within the spirit of the law and not simply comply with the minimum obligations.

This policy should be read in conjunction with associated policies, and in particular:

* + Recruitment
	+ Whistleblowing
	+ Company Values and Professional Standards.

# Policy Statement

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2020

This statement is made on behalf of P2 Consulting.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

### Our Business

P2 Consulting is one of the world’s fastest growing consultancies. We set out quite consciously with a mission to be the challenger brand in the business transformation space.

We work hands-on with our clients to drive and execute transformation, helping them to thrive in a world where customers and shareholders constantly demand more. Our services include digital and technology transformation, post-merger integration, new product or business launches, geographical expansion, customer acquisition, and regulatory change.

The business is based in the UK with operations within the USA, and services delivered internationally when required. As a consultancy within the professional services sector, it is not the view of the company that it operates in any markets or services that are likely to be considered high-risk.

### Statement

This Policy Statement affirms the commitment of P2 Consulting to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking does not taking place anywhere within its business and supply chains.

 

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

The P2 Consulting Chief Financial Officer is nominated to provide planning to identify risk and mitigate against such risks. The CFO, in turn will work with others (notably within Human Resources, Recruitment and Operations/Commercial functions) and report, as needed to the Company Board.

Our scrutiny and planning will specifically:

* Identify inappropriate employment practices
* Mitigate the risk of slavery and human trafficking occurring within the business and the company supply chain
* Identify, assess and monitor other potential risk areas
* Protect whistle-blowers.

## SUPPLIER ADHERENCE TO ANTI-SLAVERY AND HUMAN TRAFFICKING

We have zero tolerance to slavery and human trafficking.

To ensure all those in our supply chain and contractors comply with this policy we operate in line with principles of responsible sourcing, including:

* Ensuring employees are paid within the boundaries of the company’s pay policies, and which in all cases exceed the prevailing minimum wage levels applicable under legislation
* Ensuring employees work hours and benefit from holidays that all cases comply with the requirements under the Working Time Regulations
* Review the company supply chain, through the tender process, supplier reviews, and self-certification declarations, to ensure compliance with the requirements of this policy.

## CLIENT ADHERENCE TO ANTI-SLAVERY AND HUMAN TRAFFICKING

P2 Consulting is committed to only work for client organisations that support the principles of the Modern Slavery Act.

The company will make enquiries of client and prospective client organisations as part of bid processes and new contract due diligence, and commits not to work with:

* Any organisation(s) that is/are unable to provide a copy of their Modern Slavery Statement -where they are obliged under legislation to have one.
* Any organisation where there are breaches, or grounds to suspect breaches, of the Act.



## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, in our supply chains and in our business partners, we provide relevant training and communications to our staff.

In particular this is via the Induction Training Process, and communications within our Employee Handbook, Manager Guide, and within our CIX Intranet.

## DECLARATION

This Policy Statement is published in February 2020 for the financial year ending 31st December 2020, and will be reviewed regularly and at least on an annual basis.