



Modern Slavery Statement Modern Slavery and Human Trafficking Statement 2018

Policy Statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which deprive a person of their fundamental rights and liberties, with the aim of exploiting them for personal or commercial gain.

Chirality Consulting has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with the Modern Slavery Act 2015.

If evidence of modern slavery and human trafficking was discovered within our supply chain, we would expect to sanction and remove the associated supplier and re-educate all staff.

We expect the same standards from all suppliers, contractors and other business partners and, as part of our contracting processes, we include prohibitions against the use of modern slavery. We promote high standards of employee welfare and expect all suppliers to hold themselves accountable for providing similarly high standards. Our Anti-Slavery and Trafficking Policy sets out our responsibility as an ethical employer to ensure the organisation is compliant with legislation and can hold all contractors, suppliers and associates to account.

Chirality is a responsible employer which is committed to tackling modern slavery. We have effective systems and controls to diligently ensure modern slavery is not present within our supply chain. The organisation operates with transparency and integrity in all business relationships and would seek to eradicate unfair and unethical practices if these were found within our supply chain. This approach supports our guiding principles of; integrity, honesty, innovation evidence-based practice and social responsibility.

Policy & Risk Mitigation

Despite being a low-risk organisation operating within a low-risk industry we remain vigilant through the:

- Rigorous and regular assessment of all current and future suppliers to assess and mitigate any risk in relation to human trafficking, modern slavery and unethical practice;
- Staff training where appropriate.

Modern slavery and human trafficking statement

This statement sets out Chirality Consulting's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year [1 April 2018 to 31 March 2019]. As part of the broader Occupational Psychology field the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Chirality offers evidence-driven solutions, assessments, and workshops developed from the most up to date knowledge and thinking in the field. Solutions that will help organisations create and sustain their competitive advantage, whilst increasing both their efficiency and productivity. Despite being a low-risk organisation operating within a low-risk industry we remain vigilant through:

- Rigorous and regular assessment of all current and future suppliers to assess and mitigate any risk in relation to human trafficking, modern slavery and unethical practice;
- Staff training where appropriate.

Countries of operation and supply

The organisation currently operates in Europe, most particularly in the United Kingdom. The following is the process by which the company assesses whether activities or countries are high risk in relation to slavery or human trafficking:

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The board of directors are responsible for monitoring and enforcement of policies relating diligence and risk assessments of suppliers deemed a risk of modern slavery;
- **Training:** All staff are required to study the resources provided by the antislavery commission, specifically the video GLAA Modern Slavery which examines the signs of modern slavery in the UK. <http://www.antislaverycommissioner.co.uk/resources>
<https://www.youtube.com/watch?v=d9tN6FM28ws>

- **Whistleblowing policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Employee code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency worker's policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

Chirality undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include evaluating the modern slavery and human trafficking risks of each new supplier as part of a more general approach to human rights or labour rights assessment. Our business's tendering and purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.

Anonymous reporting

In the first instance the point of contact for all modern slavery crimes should be the local police force. If individuals have information about modern slavery crimes – those who are committing such crimes or where victims are at risk that requires an immediate response dial 999. If individuals hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the Modern Slavery Helpline 08000 121 700.

Board Approval

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes Chirality Consulting Ltd slavery and human trafficking statement for the financial year, ending 2018. Signed at the Board of Directors Meeting of September 20th 2018.

Managing Director: Alex Forsythe



Director: Craig Ayre

