

Modern Slavery Statement

The Risk Advisory Group (Holdings) Ltd

Introduction

This Modern Slavery Statement is made in accordance with the requirements of Section 54 of the Modern Slavery Act 2015. It sets out the steps that Risk Advisory Group companies take to ensure that slavery and human trafficking do not take place within its business or in its supply chain.

Our company and values

Risk Advisory is a global risk management consultancy. We are committed to helping the world's most discerning organisations to manage their integrity, competitor, political and security risks. Integrity is at the heart of everything we do and this is reflected in our <u>values</u> and throughout the policies we have put in place, including our Ethical & Code of Conduct Policy and our Anti-Bribery and -Corruption Policy.

Our structure and staff

Risk Advisory is headquartered in the UK and has offices in five other countries, each of which is staffed by professionals. Our employees are typically recruited directly and all are screened before employment to ensure that they uphold our values of honesty and integrity.

Upon joining the company, each employee signs a contract which enshrines their obligations to act honestly at all times. This message is reinforced throughout their time with the company from their induction with the CEO who underlines how central integrity is to our business to ongoing in-house training on our ethics and obligations.

Supply chain risks

Given the nature of our business, we believe the risk of slavery or human trafficking in our supply chain to be very low.

We typically have short supply chains, which means we have good visibility into the way that our suppliers operate and our suppliers are not allowed to subcontract work without our consent so that we can ensure that this transparency is retained. Some of these suppliers are multinational businesses which have their own policies and procedures in place to eradicate slavery in their supply chains.

Our offices and staff are largely located in countries where governance standards are good. There are, however, exceptions, and at the outset of a supplier relationship, a risk assessment and vetting

process is undertaken on all of our suppliers. Where we are heavily reliant on a single supplier or where there are low governance standards that might result in a higher risk of slavery or human trafficking within the supply chain we perform additional checks.

Annual review

We conduct a review of our higher risk suppliers on an annual basis to determine which of them we are going to target for a more in depth review. Our review might take many forms, depending on the type of supplier and the nature of the potential risk but range from site visits through the completion of detailed questionnaires to conversations between the supplier and their point of contact at Risk Advisory to clarify any specific concerns.

The results of the additional checks are documented and reviewed by our Chief Risk & Compliance Officer. If areas of potential concern are identified, we either formulate a plan with our supplier to remediate them or terminate our relationship with the supplier.

In 2018, we sent a detailed questionnaire to our key suppliers. The questionnaire was completed by over 40% of those targeted. The responses revealed no serious issues of concern.

Compliance with the law

All contracts with our suppliers contain obligations to comply with the law and to behave ethically. This message is reinforced by our staff during their interactions with suppliers and through informal training sessions with our suppliers where staff explain our ethical and legal requirements.

Signed for and on behalf of the Board:

David Claridge Group Chief Executive Officer Date: 31 March 2019