

## **Cunningham Lindsey UK Modern Slavery Statement Financial Year 2016 / 2017**

This statement has been published in accordance with the requirements of the Modern Slavery Act 2015 and sets out the steps taken by Cunningham Lindsey ('The Company') to prevent modern slavery and human trafficking happening within our business and within our supply chain.

### **Introduction**

The Company recognises that Modern Slavery (please refer to the definitions as detailed within Appendix 1) exists in the modern world and is a global and growing issue. Cunningham Lindsey and all its employees and those who work with and on behalf of the Company have a responsibility to ensure no form of Slavery or Human Trafficking exists in our business or within the supply chain of those with whom we choose to partner.

Should concerns arise, we would expect our employees or anyone working with or on behalf of the Company to raise them using the appropriate reporting channels, so that the Company can take the appropriate action.

### **Our business and our supply chains**

Cunningham Lindsey is the global market leader in claims and risk management operating in 60 territories with over 6000 employees worldwide.

The Cunningham Lindsey group includes a range of businesses working on all parts of the risk life cycle, including pre and post loss. These include experts in surveying, engineering, construction, forensic accounting, training, fire origin, environmental risk and contractor management.

Our ethical values and standards are the foundation in the way we conduct our business. We take our environmental, ethical and corporate social responsibilities seriously and have a wide range of initiatives in place to support our values to include sourcing responsibly and reducing waste to helping local communities and charitable giving.

We will ensure that the way in which we purchase goods, services and facilities and choose our business partners reflects our commitment to equality, diversity and our ethical trading values including the prevention of Slavery and Human Trafficking.

### Policies and controls

All suppliers are required to adhere to our **Ethical and Social Responsibility Policy** which requires any suppliers with whom we partner to commit to trading and operating ethically in its dealings with all parties including internal customers, their suppliers, stakeholders, public interest groups and external customers. Set out within this policy are our standards and expectations of behaviours to include standards relating to the engagement of labour, terms and conditions of employment and treatment of those who work on behalf of the supplier, prevention of discrimination, prevention of child and enforced labour in addition to seeking agreement that the supplier will adhere to employment legislation prevailing in their country. This policy forms an integral part of the commercial contract we agree with our suppliers.

Further, this policy sets out our expectation that our suppliers shall ensure that they do not condone, nor are they involved with, Slavery or Human Trafficking in any form. This also applies to any 3<sup>rd</sup> party supplier that is used in providing services or products indirectly to Cunningham Lindsey.

We are currently reviewing our audit and due diligence questionnaire which is used to conduct biennial reviews of our main suppliers for the purpose of including specific questions in relation to the prevention of Modern Slavery and Human Trafficking within the suppliers' business and their supply chains. Once this is in place our suppliers will be subject to due diligence and audit to ensure they adhere to our standards as set out above.

Employees and those working on behalf of the Company are required to adhere to our **Equality, Diversity and Fair Treatment Policy** which sets our standards relating to the way we expect individuals to behave including our commitment to ensure we conduct ourselves in an ethical way preventing any type of slavery, servitude, human trafficking and forced or compulsory labour.

We also operate a **Whistleblowing Policy** which is principally aimed at our employees but it is also available to others working with or on behalf of the Company which encourages any concerns of wrongdoing which extends to human rights violations including any incidents

relating to Modern Slavery to be reported. All reports of alleged wrongdoing are fully investigated and appropriate remedial action taken.

Our **Risk Forum** is made up of a cross section of business representatives who meet regularly to discuss all matters relating to risk management including analysing new and emerging risks and identifying appropriate solutions. The remit of our forum includes identifying risk internally and within our supply chain, monitoring potential risk areas and identifying ways to reduce risks including those of Slavery and Human Trafficking.

### Training and awareness

Raising staff awareness of the Modern Slavery Act is integral to maintaining our standards of expected behaviours.

We make sure:

- Our staff are aware of the Modern Slavery Act, including its definitions of Slavery and Human Trafficking – this is defined in our Equality, Diversity & Fair Treatment Policy;
- Staff are aware what they should do if they suspect a case of Slavery or Human Trafficking including the existence of our Whistleblowing Policy

By recognising the importance of trading ethically and contributing to the tackling of Modern Slavery, the business can benefit in a number of different ways to include;

- Protecting and enhancing our reputation and brand
- Protecting and growing our customer base as more consumers seek to deal with businesses with higher ethical standards
- Greater staff retention and loyalty based on values and respect
- Improved investor confidence; and
- Developing more responsive, stable and innovative supply chains

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking Statement for the financial year 2016/2017.

Signed

A handwritten signature in black ink, appearing to read 'David Lindsey', written over a large, stylized circular mark.

Dated

16 December 2016

## Appendix 1

### Modern Slavery Definitions

Modern Slavery is a term used to encapsulate the offences in the Modern Slavery Act which includes slavery, servitude and forced or compulsory labour; and human trafficking as follows;

**Slavery** – is the status or condition of a person over whom all or any powers attaching to the right of ownership are exercised. Since legal ownership is not possible, the key element to slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.

**Servitude** – the condition of an individual who works for another individual against his or her will as a result of force, coercion, or imprisonment, regardless of whether the individual is paid for the labour.

**Forced or Compulsory Labour** – forced or compulsory labour is defined in international law and involves coercion, either direct threats or violence or more subtle forms of compulsion.

The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

**Human Trafficking** – the offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. An offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or a job or is a child who is influenced to travel by an adult.

In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. This means that an offence can be committed if arranging or facilitating movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual purposes.