

Pillar Strategy Policy on Modern Slavery, July 2022

1. What is Modern Slavery?

Modern slavery is a real and present issue right now, harming some of the most vulnerable people in society. The term covers all forms of slavery, servitude, forced labour, human trafficking and exploitation for personal or commercial gain. That includes unacceptable practices like child labour, forced marriage and sex trafficking; unfortunately, it can be all around us but often hidden from sight, and therefore difficult to spot, and many victims don't or can't identify their situation. This makes it hard to measure the extent or true impact, which is likely to be larger than we're aware of.

This statement shares the actions Pillar Strategy has taken so far to tackle modern slavery, and our commitments on what we intend to do to help combat this offence. Human rights, fair treatment and a world free from slavery, persecution and exploitation should be a given; but they're not, so we need to step up and drive the change we want to see. At Pillar Strategy we take such a responsibility seriously. We've set ourselves goals and bold aspirations as part of our Environmental, Social, and Governance (ESG) strategy, and we're embedding these in all areas of our business with robust targets, tracking and dis-closures. An important aspect of this is managing social and environmental challenges, such as modern slavery. Pillar Strategy has a zero-tolerance approach to modern slavery, and we are committed to doing business with honesty and integrity. We believe in treating everyone with dignity and respect and are committed to raising awareness and understanding of these offences to eliminate the practice from our supply chain, customer base and other stakeholder relationships.

2. What are we doing about Modern Slavery?

Culture and Strategy

Modern slavery is firmly on the agenda for our Partnership Board, driving our zero-tolerance approach to modern slavery top down through all of our business. Our goal is to consider modern slavery at every significant decision point or gateway, ensuring every member of our staff is empowered and committed to acting on any concerns they identify. This means incorporating the risks of modern slavery into the decisions we make and how we assess, manage and protect customers, stakeholder relationships and suppliers.

Detect and Disrupt

We comply with the relevant laws and practices on how we should treat our staff, customers and stakeholders, such as by paying the voluntary living wage. But our role extends beyond that, to the business practices and behaviours of everyone in our entire business ecosystem. Modern slavery could appear in our suppliers' businesses, or further down the supply chain through the suppliers of our suppliers.

Our products and services could be used by modern slavery offenders, like slavery gangs and people traffickers.

Modern slavery could appear in our potential clients' businesses. In the same way as we carry out financial checks on our customers probity, for example, on Anti-Money Laundering and Imposition of Sanctions following the invasion by Russia of Ukraine, we also carry out checks for modern slavery related risks; where we identify such risks we may decline to provide our services to those customers, explaining our reasoning where that is appropriate.

Criminals may try to exploit our colleagues or customers in their efforts to launder their money and engage in financial crime. It is therefore vital that everyone in our business knows when, where and how to look for signs of modern slavery, supported with the right processes, systems and controls to make sure we do everything possible to stamp it out for good, wherever it exists.

Policies, Process and Risk

We give our staff a framework of policies, processes and technical standards to operate our business safely and effectively. There are measures and guidance designed to help us identify, assess and combat all aspects of financial crime, including money laundering and corruption, which are sometimes linked to modern slavery.

We're committed to reviewing our Anti-Corruption and Anti-Money Laundering Policies on clients who may be subsidising or involved in tolerating these practices; we are also committed to having the right controls in place for mitigating crime risks. These controls support the mitigation of modern slavery-related offences in our operations. We manage modern slavery risks in our customer relationships by doing our due diligence while on-boarding and then refreshing customer data as we embark on new engagements and hold periodically throughout the customer consulting lifecycle. We monitor customer activity to identify suspicious activity which might indicate modern slavery; where there's cause for concern, we make extra checks and follow the necessary reporting. In the UK this might include escalation to the National Crime Agency.

We work closely with external agencies as well as conducting research to stay on top of emerging modern slavery trends. The intelligence we get from this helps us strengthen our capabilities to recognise red flags in customers' behaviours.

We continue to monitor existing, new and emerging modern slavery risks in our business, updating and establishing new policies and processes to help us react appropriately.

Training and Awareness

We provide a suite of learning showing the knowledge, behaviours and practices that are important to a client-focused consulting business like ours. Our mandatory 'Risks' course is all-encompassing educating our staff on crime, awareness of mal-practice, market abuse and whistleblowing covering anti-corruption, sanctions,

independence and anti-money laundering training, raising awareness of such crime risks. We have updated it this year (2022) to cover modern slavery and sanctions, with guidance on spotting red flags which indicate that we are likely to decline to work with the entity involved. We review our training and policy every year, so they stay aligned with legislative requirements and market practices, along with our internal policy and process changes. We've also identified where additional bespoke training on modern slavery is appropriate; our pre-assignment risk assessment functions play a vital role in the identification and escalation of modern slavery. We're committed to ensuring our processes are fit for purpose, helping us create bespoke learning that best equips new and existing colleagues to identify, manage and report suspicious related activity.

3. Suppliers and Stakeholders

We function in a responsible, ethical, open and transparent way; we expect the same from the suppliers and stakeholders we work with. We want to ensure they uphold the same standards as we do, encouraging greater transparency within company supply chains to stamp out modern slavery-related offences.

Suppliers

Pillar Strategy has a supplier base commensurate with its role as an SME providing consulting services. We operate a risk-based approach to initial and ongoing due diligence which includes a review of suppliers' ethical and social responsibility credentials. Our robust sourcing and due diligence processes are continually reviewed to ensure they are fit for purpose and reflective of current risks.

Our Supplier Code of Conduct sets out the standards, principles and behaviours we expect from our suppliers. Above all, we want to do right by our staff. We protect and respect human rights and essential labour standards, including the International Labour Organisation Core Conventions. We expect our suppliers to be as committed as we are in embracing vital regulation such as the Modern Slavery Act 2015. Our main suppliers must affirm they've read and will comply with our code; we will work through any challenges our suppliers are facing to meet that objective.

Other Stakeholders

When we work with recruitment services, we make sure our suppliers apply the same high standards that Pillar Strategy does, for example verifying ID, the right to work in the UK, and running criminal background and credit checks helps us learn who we're employing to identify whether someone is connected to modern slavery-related activities, as perpetrator or victim. We want everyone to feel comfortable with our values, the values of our clients and the assignments we undertake, but we rely on our staff (like our suppliers) to make it happen. We know that by working with a shared purpose and values that we can make a difference.

4. Our Aspirations

We want to take the same approach to combating modern slavery as we do for delivering exceptional customer experiences that go beyond consulting. That means

being straight up, offering high quality and relevant services. We should always search for new ways to tackle modern slavery, and really challenge everyone we interact with to take action.

We welcome the Independent Anti-Slavery Commissioner's review ¹ on '**Preventing Modern Slavery and Human Trafficking**'. We have closely reviewed the outputs of these recommendations and will evolve our approach, aligned to these. Modern slavery is a distressing reality. We believe it's everyone's responsibility to change that, and we know that Pillar Strategy and its staff can be a positive force in that cause.

It's vital that Pillar Strategy responds to modern slavery in a way that reflects our purpose and our values. That means being honest about the status of modern slavery within our industry, taking responsibility for doing something about it, and following through on those commitments.

Our aspiration is to ensure that by 2030 none of our customers will be paying their staff and supply chain at levels below the poverty threshold and that lower-income households have to access basic services.

On behalf of the Pillar Strategy Partnership Board, we confirm our commitment to working with not just our staff but also our suppliers, customers and many other stakeholders to continue to drive change and help make modern slavery a thing of the past.

¹ See <http://www.antislaverycommissioner.co.uk/news-insights/the-modern-slavery-act-2015-statutory-defence-call-for-evidence-review-published/>