



# Modern Slavery and Human Trafficking Statement

April 2019

Modern slavery is a crime and 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.

This statement sets out Copper Consultancy'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.

Copper 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 before being registered on Copper's approved suppliers list.

Copper does not, and will not support the use of child labour within the company or our suppliers. A suitable risk assessment shall be carried out for any young persons engaged in work with Copper (e.g. on work experience), and they shall not be made to work more than 40 hours per week.

Copper regularly reviews existing suppliers and when considering taking on new suppliers will map their supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.

Copper 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.

When reviewing suppliers Copper will consider:

- our business's 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;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation and what external help is available eg. Modern

## Slavery Helpline

- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

The board of Directors have the responsibility to ensure this statement complies with our legal and ethical obligations, and that all those under our control comply with it.

A handwritten signature in cursive script that reads "Chair Gordon".

**Chair**  
**April 2019**