

Modern Slavery Act Statement

October 2026



This statement is published on our website controlrisks.com and uploaded to the UK government's modern slavery statement registry.

This statement summarises the steps that Control Risks has taken to ensure that slavery and human trafficking are not taking place either within our business or in our supply chains. The statement refers to the financial year ending 31 March 2026 (“FY25-26”), in accordance with Section 54 of the Modern Slavery Act 2015. It is made on behalf of Control Risks Group Limited, our UK entity, however this report reflects the global commitments and policy applicable to all entities across our group. It has been reviewed and approved by the Board of Directors of Control Risks International Limited (the group’s holding company) which includes the Directors of Control Risks Group Limited.

Our business and supply chains

Control Risks is a specialist risk consultancy that helps to create secure, compliant and resilient organisations in an age of ever-changing risk. We work from an international network of 42 offices on every continent except Antarctica and operate in accordance with shared standards and principles. Employing around 5,000 people from highly diverse backgrounds, we work with clients from the public, private and non-profit sectors. We have worked for clients from all industry sectors in more than 150 countries.

In general, our supply chains are those providing goods and services to facilitate the operation of our offices or providing services to support the delivery of our client services.

Sustainability Committee

In making sustainability one of the strategic pillars at Control Risks, we made a commitment to provide clarity on what we are doing as an organisation to support the sustainability of people and planet. Our Sustainability Committee is made up of partners within our business supported by subject-matter experts and it reports regularly to the Group Executive Committee and the Board. The Sustainability Committee oversees and monitors the development and implementation of our sustainability strategies across our business. A sub-committee focuses on Human Rights and Labour.

Policies

Code of Ethics

Our [Code of Ethics](#) summarises our commitment to business integrity. It affirms that we have zero tolerance for modern slavery and human trafficking. We expect our suppliers to provide a decent working environment for their own employees in accordance with the International Labour Organisation (“ILO”) core conventions.

Human Rights Policy

Our [Human Rights Policy](#) provides further elaboration on the full range of our human rights commitments. It reminds our employees that we must assess the risk that Control Risks’ activities could – directly or indirectly – contribute to human rights abuses before accepting a new client or assignment. If project managers are uncertain whether any proposed work could pose an ethical or human rights risk, they are encouraged to consult the Ethics Committee. Chaired by an independent adviser and comprising the CEO, Chief Legal Officer and other members appointed by the CEO, the Committee considers and rules on matters that may pose an ethical risk to the company.

Supplier Management Policy

We maintain a global Supplier Management Policy that builds on our Human Rights Policy, focusing on how to implement those principles in our supplier relationships. It states that the selection and management of suppliers must “minimise the risk of illegal, unethical or unprofessional behaviour” and specifically “where a supplier provides personnel to Control Risks it should have ethical employment practices” (see the due diligence section below).

Third Party Code of Conduct

We communicate our expectations of suppliers and other third parties through our [Third Party Code of Conduct](#); it defines the labour, human rights and ethical business standards they are required to meet. The Code is published through our Trust Centre (on our public website) and embedded within our contractual framework. In line with the ILO core conventions, we expect suppliers to protect workers’ rights, support fair and lawful employment practices, and maintain mechanisms through which concerns can be raised and addressed. Suppliers are also expected to assess potential modern slavery risks and implement measures to prevent and mitigate those risks across their own supply chains.

Whistleblowing Policy

We recognise the importance of enabling our employees to speak up about any ethical concerns, including with regard to labour welfare within our supply chains. Our global Whistleblowing Policy ensures that employees can be confident that they will not face any retaliation or detrimental treatment as a result of raising a concern. If they do not feel comfortable talking with their manager, they can make a confidential report to our whistleblowing hotline. This hotline is run by an independent provider and facilitates anonymous reporting. The policy is easily available to employees on our intranet and we maintain a dedicated intranet page to highlight the hotline contact details and collate relevant whistleblowing guidance in one location. We also raise awareness of the hotline via our ongoing cycle of human rights and anti-corruption compliance training. In the year under review, we did not receive any whistleblowing reports relating to modern slavery.

External grievance procedure

We are always ready to listen to anyone outside the company who wishes to raise a concern, make a complaint, or express a grievance relating to our ethical conduct, including with regard to modern slavery.





We publish details of our [Grievance Process](#) on our external website. External parties who wish to raise concerns are encouraged to contact one of our employees directly or to make contact with us via a designated [email address](#). We publish information relating to our Grievance Process in Iraq in English, Arabic and Kurdish on a separate webpage on our external website.

Risk assessment

In FY25-26 we implemented a new risk management platform across the group. This enhanced our risk assessment processes by strengthening collaboration, oversight, reporting and accountability.

The platform also provided a foundation for further development of our enterprise risk management framework. In the year under review, we began the development of a dedicated enterprise risk to address modern slavery and supply chain labour practices; this has since been launched in the following financial year (FY26-27). The introduction of this enterprise risk establishes a consistent approach to identifying, assessing, monitoring and reporting labour-related risks; ultimately, this achieves a more comprehensive understanding of labour-related risks across our global operations.

The majority of our direct employees are trained professionals with specific skillsets and qualifications, meaning the issue of forced or child labour does not arise in our own operations.

However, we are alert to the potential risks associated with services provided by our suppliers. We pay particular attention to the risk that providers of services, such as office cleaners, might employ migrant or otherwise disadvantaged workers who may be more vulnerable to exploitation and poor worker welfare conditions. We are conscious that the risks relating to the supply of personnel apply both in industrialised and in emerging economies: we address them through our Supplier Management Policy and procedures (see above), including our approach to due diligence (below).

Modern slavery risk reviews in Iraq

In the previous reporting period, we undertook a pilot modern slavery risk review focused on the employment of guards in our southern Iraq operations. The experience gained through this assessment has strengthened our understanding of modern slavery risks and informed our approach to workforce welfare in higher-risk locations.

In the year under review, we undertook a similar modern slavery risk review in our operations in northern Iraq. This involved worker interviews, leadership interviews and a follow-up document review stage to establish whether the practices described by interviewees were aligned with relevant policies and procedures. The results of this risk review were positive with no major concerns being raised. Where opportunities for improvements were identified, those actions have been assigned owners and progress is being tracked.

Due diligence

At the selection stage, we require suppliers of personnel to explain their own recruitment and employment practices via a questionnaire. This process was developed by our own subject matter specialists and is tailored to our business. It covers, for example, whether workers pay fees as part of their recruitment process, the payment of sick leave or overtime and the availability of grievance mechanisms. We emphasise that employees should discuss any concerns with their managers as part of these vetting procedures.

Our vetting procedures are calibrated according to the levels of risk associated with different categories of suppliers, drawing on their answers to our questionnaires and conducting external enquiries where appropriate.

Once selected, we require suppliers to commit to contractual obligations to comply with all applicable anti-slavery and human trafficking laws and our own Third Party Code of Conduct. Our contracts also include the right for Control Risks to audit and to terminate the relationship if the supplier is in breach of those

obligations. In the event that a breach by a supplier is identified, we will work closely with our in-house specialists to guide our response; protecting the interests of those workers affected is a key concern.

Training

We implement a regular cycle of human rights training for employees. Our internal human rights training course is written by our in-house specialists, allowing us to focus on issues that are directly relevant to our operations. After watching a series of videos, employees complete a test to demonstrate their understanding. The training is available to everyone, and mandatory for all senior employees within internal corporate functions as well as all members of our service delivery and business development teams. The labour-focused section in the training refers to international labour conventions and the Modern Slavery Act. It is important that our employees can recognise any potential problems in relation to the suppliers that they interact with; we encourage our employees to remain alert and to escalate any concerns, either directly to their managers or through the whistleblowing function.

To reinforce our training and encourage discussion we periodically circulate ethical dilemmas by email, inviting our employees to vote on the best course of action and share their thoughts on the scenario. This initiative is successful in bringing our policies to life. When closing the discussion, we share (anonymously) any particular feedback from colleagues which raised key points to learn from.

Enhancing effectiveness

We have benchmarked our Modern Slavery Act policies and procedures with those of comparable professional service firms and judge that our approach is proportionate and effective in addressing the most salient risks that apply to our business. However, we are committed to a process of continuous improvement in our approach to this important global issue.

EcoVadis assesses organisations against a range of sustainability criteria across four themes, including labour and human rights. At the time of writing, we have recently submitted our application for our third annual rating from EcoVadis. Continued engagement with the assessment process helps us benchmark our performance and identify opportunities for ongoing improvement.

We have been a signatory to the UN Global Compact since 2007 and issue an annual [Communication on Progress](#) (COP) affirming our application of the Global Compact’s ten principles, including with regard to labour rights.

Bill Udell

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Director of Control Risks Group Limited

