Modern Slavery and Human Trafficking Statement 2025

1 Introduction

This Modern Slavery Statement relates to the financial year ending 2025.

Abbott Risk Consulting Ltd (ARC) is committed to conducting its business ethically and responsibly, respecting human rights and taking appropriate steps to prevent modern slavery and human trafficking within its operations and supply chains.

We recognise that modern slavery can occur in any sector and that identifying and addressing the associated risks requires ongoing vigilance, proportionate due diligence and collaboration with employees, subcontractors and suppliers. ARC is committed to continually improving its approach to identifying, assessing and managing these risks.

2 Organisational Structure, Operations and Supply Chain

ARC is a private limited company registered in Scotland (SC234532) with offices throughout the UK. ARC also operates in Australia and is registered there as a foreign company (ABN 96 144 722 065). ARC employs approximately 180 people across its eight offices: five in the UK and three in Australia.

ARC is a Safety, Engineering and Risk Management Consultancy providing professional services to high-hazard industries including the Oil & Gas, Nuclear, Defence, Rail, Mining and Clean Energy sectors. We employ highly skilled professionals and engage similarly skilled subcontractors and consultancy partners where project requirements demand additional support or specialist expertise.

As a professional services organisation, ARC maintains a relatively limited supply chain. Our suppliers include professional services and advisers, such as risk and safety specialists, insurers, legal advisers and IT consultants; office support services, including stationery, cleaning, IT equipment and software; and hospitality services, including accommodation and corporate events. Most of our suppliers are based in the UK and Australia, although ARC also uses travel and accommodation services in other countries. Some technology and software services are supported by global supply chains.

ARC maintains oversight of supplier relationships to help ensure procurement decisions align with its ethical standards and relevant business requirements. Due to the nature of our business, our supplier relationships are predominantly with direct (Tier 1) suppliers, and our visibility of lower-tier supply chains is limited.

ARC operates as a single legal entity and does not own or control any subsidiary entities. In preparing this Statement, ARC consulted with representatives from its UK and Australian operations to ensure that the identified risks, actions and information presented accurately reflect the business across both jurisdictions.

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3 Policies, Risk Assessment and Management

ARC is committed to conducting business ethically and responsibly and maintaining effective policies, procedures and controls to help prevent modern slavery, forced labour, exploitive child labour and human trafficking within its operations and supply chains.

This commitment is supported by a range of policies and procedures, including:

- **Modern Slavery and Human Trafficking Policy**, which sets out our commitment to preventing modern slavery, forced labour, child labour and human trafficking within our operations and supply chains.
- **Employment and Recruitment Procedures**, which include right-to-work verification, employment contracts and age verification checks. ARC does not retain employees' original identity documents and only engages individuals who freely choose to work. Employees can raise concerns about their employment or treatment at work through the Grievance Procedure.
- **Employee Agreement**, which sets out the standards of conduct, behaviours and ethical expectations required of all ARC employees.
- **Subcontractor and Supplier Requirements**, which require subcontractors and suppliers to comply with applicable laws and relevant ARC requirements, including those regarding ethical and responsible business conduct.
- **Whistleblowing Procedure,** which provides a mechanism for raising concerns about suspected wrongdoing, including concerns relating to modern slavery or unethical practices within ARC or its supply chain.

As a certified Living Wage Employer, ARC is committed to fair remuneration and encouraging responsible employment practices throughout its supply chain.

ARC assesses the risk of modern slavery within its operations and supply chains as part of its wider risk management processes. The risk is recorded in the company risk register and considered as part of the periodic review of business risks. The assessment takes account of the nature of ARC's operations, the sectors in which it works, the goods and services it procures, and its relationships with suppliers and subcontractors.

As a professional services consultancy employing highly skilled personnel, ARC considers the risk of modern slavery within its direct workforce to be low. However, ARC recognises that risks may arise within its supply chain, particularly in labour-intensive services such as cleaning, hospitality and accommodation. Risks may also exist within the wider supply chains of technology, equipment and business support providers.

ARC takes a proportionate approach to managing these risks through recruitment and right-to-work checks, subcontractor onboarding requirements and supplier due diligence. The nature of the goods or services supplied and the information available about individual suppliers inform the assessment of potential risks and any further action considered necessary.

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4 Due Diligence, Reporting and Remediation

ARC applies a proportionate approach to due diligence that reflects the nature of its operations, supply chain and assessed modern slavery risks.

To help identify and manage potential modern slavery risks, ARC:

- **Undertakes supplier and subcontractor onboarding checks**, which may include verification of business details, relevant insurance and other checks appropriate to the nature of the engagement.
- **Seeks to work with reputable suppliers** and considers the nature of the goods and services procured when assessing potential supply-chain risks.
- **Sets expectations for subcontractors** through its policies, procedures and contractual arrangements, including requirements relating to ethical business conduct and modern slavery.
- **Uses procurement and contract management processes** to manage supplier relationships and address relevant risks.
- **Is developing its supplier evaluation processes and Sustainable Procurement Policy** to support a more structured approach to responsible sourcing and supply-chain risk management.

ARC recognises that its due diligence arrangements continue to develop and is committed to improving its approach to identifying and managing modern slavery risks throughout its supply chain.

ARC encourages employees, subcontractors and other relevant stakeholders to raise concerns about suspected modern slavery or other unethical conduct through established reporting channels.

Concerns relating to ARC, its subcontractors or its supply chain should be reported to the Human Resources Manager via hr@consultarc.com. Suspected modern slavery outside ARC's operations may be reported to the relevant authorities. In the UK, non-emergency concerns can be reported to the police on **101**; in Australia, the Police Assistance Line is **131 444**. Where there is an immediate risk to life or safety, call **999** in the UK or **000** in Australia.

Concerns raised with ARC will be assessed and investigated in accordance with relevant company procedures. Where appropriate, ARC will take action to address identified issues and escalate concerns to the relevant authorities.

During the reporting period, ARC did not identify any instances of modern slavery within its operations or supply chains requiring remediation. If any instances are identified, ARC will take appropriate action to address the situation, mitigate adverse impacts and reduce the risk of recurrence.

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5 Training and Communication

ARC is committed to ensuring all employees understand the risks of modern slavery, forced labour, child labour and human trafficking, and their role in identifying and reporting concerns.

Our Modern Slavery and Human Trafficking Policy is communicated to new employees as part of the induction process and to all employees whenever updates are made.

In 2024, ARC introduced formal modern slavery awareness training. Initially targeted at employees with procurement responsibilities, the training has since been made available to all employees. Employees are required to complete the training upon joining ARC and thereafter every two years.

The course covers key requirements of modern slavery legislation, the different forms of modern slavery, how to recognise potential indicators, and the actions individuals and organisations can take to help prevent and address these risks.

ARC will continue to promote awareness of modern slavery risks through training and internal communications.

6 Assessing Effectiveness and Continuous Improvement

ARC assesses the effectiveness of its approach through the review of training completion rates, supplier due diligence activities, identified risks, and any concerns raised through company reporting channels.

During the reporting period, ARC continued to strengthen its approach by piloting enhanced supplier evaluation measures, further integrating ethical considerations into procurement activities, introducing a whistleblowing procedure and maintaining a 98% employee completion rate for Modern Slavery awareness training.

To support continuous improvement, ARC intends to:

- Finalise and implement its Sustainable Procurement Policy.
- Establish and maintain an approved supplier list.
- Achieve and maintain a modern slavery training completion rate of at least 95%.
- Continue proportionate due diligence on suppliers and subcontractors.
- Continue monitoring higher-risk supplier categories, including cleaning, hospitality and accommodation services.
- Improve understanding of modern slavery risks beyond Tier 1 suppliers where proportionate and practicable.
- Periodically review modern slavery risks, policies and procedures to ensure they remain effective and aligned with evolving best practice.

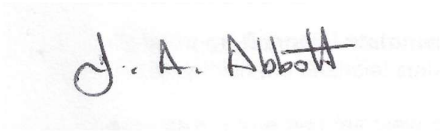
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7 Approval

ARC will not knowingly support or conduct business with any organisation involved in modern slavery or human trafficking and has not, to the best of its knowledge, conducted business with any organisation found to be engaged in such practices.

This statement covers ARC's UK and Australian operations and relates to the financial year ending 2025. It has been prepared with reference to the requirements of Section 54 of the UK Modern Slavery Act 2015 and the mandatory reporting criteria set out in Section 16 of the Australian Modern Slavery Act 2018.

This Statement has been approved by the Board of Directors, which maintains overall responsibility for oversight of ARC's approach to preventing modern slavery and human trafficking, and is signed on behalf of the Board by the Managing Director.



John Abbott, Managing Director

02/11/2026

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