

1. Introduction

As a provider of risk advisory services including ESG-focused due diligence, we are cognisant of the risks presented by modern slavery and human trafficking and the need to embed effective systems and controls to prevent these practices from occurring anywhere in our business or supply chain. S-RM is committed to this effort and to the promotion of ethical employment and working practices, and we expect the same high standards of all our subcontractors, suppliers and other business partners. This includes a zero-tolerance approach to modern slavery.

This Modern Slavery Statement has been produced for our financial year ending 30 September 2022 ("FY21-22") and has been approved by S-RM's Board of Directors. We will update this statement annually to inform interested parties of the steps that we have taken during the previous financial year to identify and address modern slavery risks within our operations. It will be published on our website and uploaded to the UK Government Modern Slavery Registry.

2. Organisation and supply chain

Founded in 2005, S-RM is a global intelligence and cyber security consultancy. S-RM employs around 350 individuals across eight office locations in the UK (HQ), South Africa, Brazil, the United States, Hong Kong, the Netherlands and Singapore.

We work for clients in both the public and private sector as well as government and not-for-profit organisations, helping them manage and mitigate a range of risks. We recognise that, in providing services to clients, we are part of a supply chain that consists of our clients and, in some cases, intermediaries acting on behalf of our clients, as well as our own supply chain consisting of subcontractors and our suppliers.

Subcontractors

S-RM uses a network of subcontractors to assist with its provision of services to clients. All subcontractors are onboarded in line with the **S-RM Subcontractor Onboarding Procedure**, which includes stringent vetting that is completed during initial onboarding and repeated annually. Our standard **S-RM Subcontractor Agreement** contains provisions on modern slavery and requires our subcontractors to agree to comply at all times with the UK Modern Slavery Act 2015 and the **S-RM Code of Conduct**.

Suppliers

S-RM uses suppliers to support our offices and day-to-day operations, including providers of software and hardware as required by our business. We always seek to engage with reputable suppliers who share our values and commitment to ethical employment practices.

3. Policies in relation to slavery and human trafficking

S-RM has in place a number of policies which support our commitment to employment and labour rights, including the **S-RM Whistleblowing Policy**, enabling staff to raise any concerns about labour rights or possible modern slavery issues, and the **S-RM Code of Conduct** which contains a section on Modern Slavery and Human Trafficking, all of which are available on the S-RM intranet. We expect all of our employees, sub-contractors, suppliers and partners to adhere to these standards and will not work with anyone who does not.

4. Risk assessment

S-RM operates an Enterprise Risk Management (ERM) Framework, which includes assessing and managing risks associated to our business conduct and ethics, such as modern slavery and human trafficking. The **S-RM Risk Management Procedure** provides guidance on how we assess and respond to risk across the business, including all S-RM business units, departments and international offices.

S-RM has assessed the risk of modern slavery or human tracking occurring in our business or within our supply chain to be low. This is because the majority of our employees and sub-contractors are professionals with specific industry relevant qualifications and experience. Furthermore, our office locations are in countries where governance standards and labour laws are typically strong. We appreciate, however, that risks could arise in our use of certain suppliers such as office cleaners, providers of hardware and other office equipment, and from our use of subcontractors in higher risk locations and industries.

5. Training and next steps

During FY22-23 we are planning to further enhance our due diligence processes by rolling out an onboarding questionnaire for all subcontractors and suppliers, which will include questions relating to employment practices and supply chain, the answers of which will be used to assess whether further checks are required. We will update the **S-RM Supplier Management Procedure** to provide specific instructions on confirming that checks have been made to ascertain the supplier's compliance with applicable modern slavery laws. We also intend to roll out training on modern slavery and human trafficking to all S-RM employees.

Heyrick Bond Gunning

CEO, S-RM Intelligence and Risk Consulting Limited

Chairman of the Board of Directors