

## HPO Risk Solutions Modern Day Slavery Statement

**Last reviewed – 16/02/2020**

**Next review due – 16/02/2021**

### Guidance

The Act requires each organisation to publish a slavery and human trafficking statement on their website and include a link in a prominent place on its homepage. The purpose of this measure is to increase transparency and it is vital that the statement can be easily accessible by anyone who wants to see it – the public, consumers, employees, NGOs or investors. For organisations with no website, a copy of the statement is to be provided to anyone who requests one in writing. The copy must be provided to the requestor within 30 days of the receipt of the request, where a statement has been produced and is available.

The Act is clear that the link must be in a prominent place on the home page itself. A prominent place may mean a modern slavery link that is directly visible on the home page or part of an obvious drop-down menu on that page. The link should be clearly marked so that the contents are apparent. We recommend a link such as ‘Modern Slavery Act Transparency Statement’.

Organisations are legally required to publish a statement for each financial year of their organisation. Organisations should publish their statement as soon as possible after their financial year end. We expect this to be, at most, within six months of the organisation’s financial year end. Organisations may wish to publish these statements at the same time as they publish other annual accounts.

### Contents

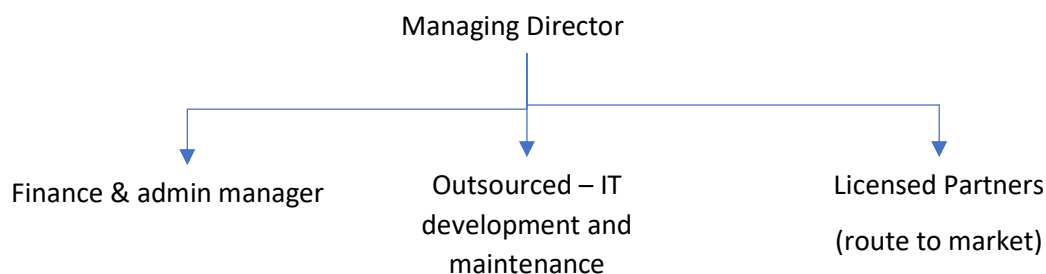
About <b>HPO Risk Solutions Ltd</b> .....	2
Responsibilities of Management.....	2
Responsibilities of Staff .....	3
Policies in relation to slavery and human trafficking .....	3
Due diligence processes .....	3
Risk assessment and management .....	4
Key performance indicators to measure effectiveness of steps being taken .....	4
Training on modern slavery and trafficking .....	5
Review .....	5

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that HPO Risk Solutions Ltd has taken, and is continuing to take, to make sure that

modern slavery or human trafficking is not taking place within our business or supply chain during the year ending 26/02/201. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. HPO Risk Solutions Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the company or our supply chain.

#### About HPO Risk Solutions Ltd

We provide behavioural assessments signposting emerging risk to desired and undesired business outcomes via online platform with results being displayed via an business analytics tool. We also provide Enterprise Risk Management system solutions. The sector(s) we work include automotive, renewable energy creation, shipping and financial services in effect working with management to optimise business performance. The business does not carry out any seasonal work.



Good and services are sourced from the UK and where these suppliers have supply chains that reach outside the UK, say the US or Europe they are required to meet our standards. We do not source from high risk countries. Our supply chain are very simple, the It provider for example is based in UK but coders can be based in other European countries or outside if a specific need arises.

Our operating model is not to import risk to business sustainability in the long term. Consequently, we run very lean and outsource to competent third parties and work through partners to deliver services as often as we are able.

We build effect relationships with suppliers, working to mutual benefit. Given the size of the business we do not need to work with others representing workers.

#### Responsibilities of Management

Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Managing Director. The MD ensures staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid modern day slavery practices infiltrating the company by:

- Making sure all are aware of the policy and the arrangements, and the reasons for the policy;
- Properly dealing with concerns, fairly and as quickly as possible.

- Properly maintaining records.

#### Responsibilities of Staff

Responsibility for ensuring that the company avoids modern day slavery rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- make themselves aware of, and comply with this policy and arrangements;
- inform the Managing Director if they become aware of any practice or instance that potentially involves exposure to modern day slavery
- Conduct due diligence in all recruitment and contract negotiations.

#### Policies in relation to slavery and human trafficking

We will:

1. Examine internal business procedures to avoid making demands of suppliers or subcontractors that might lead them to violate human rights, including children's rights. These types of demands include insufficient or late payments, and late orders or high-pressure deadlines resulting from poor demand forecasting.
2. Ensure that zero tolerance for modern slavery and respect for human rights, including children's rights, are built into contracts and represented in dialogue, self-assessment, audits, training and capacity building opportunities for suppliers, subcontractors, customers, and other business partners.

#### Due diligence processes

Many human rights breaches, including modern slavery, are not immediately apparent. In fact, some suppliers may even go to great lengths to hide the fact that they are using slave labour.

We will:

1. Ask all of our suppliers to provide evidence of compliance to our code of conduct by agreeing to the following statement:  

“The contractor warrants that it has thoroughly investigated its labour practices and those of its direct suppliers to ensure that there is no slavery or forced labour used anywhere in its organisation or used in any of its direct suppliers’ or subcontractors’ organisation. The contractor further warrants that it has put in place all necessary processes, procedures, investigations and compliance systems to ensure that the warranties made above will continue to be the case at all times. HPO Risk Solutions Ltd reserves the right to audit your supply chain at any time, with prior notice if it has reason to suspect that the above requirements have not been met.”
2. not knowingly support or deal with any businesses involved in slavery or human trafficking.
3. pay all employees at least the national minimum wage/national living wage (as appropriate, or London Living Wage for London only) currently in operation

4. Ensure our supply chain pay all employees at least the national minimum wage/national living wage (as appropriate, or London Living Wage for London only) currently in operation
5. Assess the physical appearance of candidates or current employees/staff at interview and/or other arranged meetings/appointments; whilst maintaining an awareness of the signs of psychological abuse (i.e. malnourishment, unkemptness, those that appear withdrawn/fearful or who wear the same clothes daily)
6. Record details of persons who do not have, or have difficulty in producing, their own personal identification and/or other documents/records, or have to seek these from other persons;
7. Monitor registered addresses of personnel using electronic systems to ensure employees/staff who have not declared themselves as family or marital/civil or other partners, are not residing at the same address unless a reasonable justification exists.
8. Operate a policy whereby all employees/staff must arrange and discuss their employment/work/assignments/patterns/availability etc. directly with the company themselves, and not through a third party, unless a suitable justification exists.

Risk assessment and management

Vulnerable Populations We employ migrant or low skilled workers	Business Model – We outsource labour management	Product or Service - We provide/ hire service sector workers	Geographies - We source from countries where the rule of law or human rights are weak	We pay wages in cash.
Yes = +20%	Yes = +20%	Yes = +20%	Yes = +20%	Yes = +20%
No = +1%	No = +1%	No = +1%	No = +1%	No = +1%

Total Risk Factor =   5  %

We only outsource labour management in the context of an Outsourcer supplying services. We do not outsource the management of our own labour.

Key performance indicators to measure effectiveness of steps being taken

1. Staff turnover
2. Staff progression
3. Personal Development and appraisal meetings
4. Salaries paid electronically to named bank account

Training on modern slavery and trafficking

Briefing sessions will be held for new staff on modern day slavery and equality issues as part of an induction programme. These will be repeated as necessary.

Training will be provided for anyone on this policy and the associated arrangements.

Review

The effectiveness of this policy and associated arrangements will be reviewed as part of Financial Year End under the direct supervision of the Managing Director.

A handwritten signature in black ink, appearing to be 'I. Rosam', written in a cursive style.

Signed by the Director

Print: Ian Rosam

Date: 16/02/2020