

Gladstone Brookes Ltd

Modern Slavery Act 2015:

A statement on slavery and human trafficking

Introduction from the Director

Gladstone Brookes continually strive to ensure we act fairly, ethically and transparently in everything we do. As name synonymous with the claims management industry, we are keen to ensure the Fair Treatment of all staff inclusive of our supply routes.

The requirements of the Modern Slavery Act 2015 (the Act) reflect the international drive to eradicate modern slavery in commercial organisations. We aim to aid with upholding this international goal by ensuring that any risk of modern slavery or human trafficking in our supply chains and in any part of our business is offset by the reasonable measures that we take as a business to identify and monitor any such risks.

Gladstone Brookes understand the importance of this goal and wholeheartedly support the achievement of the same within our organization. We consider this in the selection and continued relationships with all of our suppliers in the UK and overseas.

Recognising the risks that modern slavery poses and taking positive action to ensure these risks do not materialise is key to ending modern slavery within organizations and the supply chains that they work with. It is our intention to lead by example in our direct operations and ensure that our supply chains duly follow suit.

Further information on our approach to Anti- Slavery can be found below and is supplemented by our Polices on Anti-Money Laundering, corruption, gifts & hospitality And Employee Recruitment procedure.

Organisation's structure

We are a provider of Financial Claims Services in the Claims Management sector. We are not a part of a group of companies, and company is a private limited company.

Gladstone Brookes Ltd has its head office in the United Kingdom. We have over 300 employees and agents worldwide and operate in the United Kingdom and South Africa.

Our business

Our business is organised into 4 business units:

- **New Business**

This unit deals with initial enquiries and pre-contractual queries and contact

- **PPI Check**

This unit deals with the PPI CHECK service. From receiving a contract back to obtaining confirmation of the PPI Status.

- **PPI Claim**

This unit deal with the PPI CLAIM service. From confirmation of contract to expedition of the outcome.

- **Head Office**

Deal with back office functions such as accounting, training and internal audit.

Our supply chains

The latest list of our supplier of services can be located in Section 8 of our Privacy Policy which can be located on line at <https://www.gladstonebrookes.co.uk/privacy-policy/>.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our **Policies** reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

OUR APPROACH TO DOING BUSINESS AND SOCIAL STANDARDS

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we make appropriate checks with our suppliers to ensure that all staff are treated fairly and in line with the Act.

In order to do this effectively, we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our Policy

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a rigorous supply chain compliance programme. This consists of:

- Issuing a policy on recruitment which includes the checking and recording of Identification and right to work in the relevant country.
- Desk based checks of HR records

- Onsite visits to the premises to ensure adequacy of working conditions through verbal statements from employees and physical evidence.

We have a dedicated compliance team, which consists of involvement from the following:

- Audit and compliance
- Human resources
- Procurement
- Sales

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. [We also require our business partners to be aware of and adhere to our policy on Modern Slavery].

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

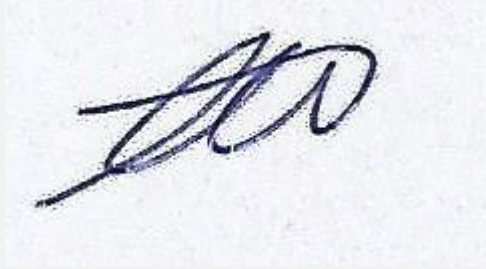
- Adequate safe guarding is in place surrounding Recruitment within supply chains and the Organization itself.
- Contracts with suppliers are in place, Pre-contractual check and site visits ensure that Supplier practices are compliant with Modern Slavery Act 2015.
- Annual Audits on supplier recruitment, staff treatment, hours worked, breaks etc.
- Awareness regarding whistle blowing procedure.
- Number of breaches occurred

Further steps

Following a review of the effectiveness of the steps we have taken in 2019 to ensure that there is no slavery or human trafficking in our supply chains we intend to review and revise this statement annually and where appropriate identify further steps to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Gladstone Brookes Ltd's slavery and human trafficking statement for the financial year 2019.

Anthony Chorlton, Director.



SIGNATURE:

Gladstone Brookes Ltd

Date:19/02/2019