



Gladstone Brookes Ltd

Director's 2020 Statement on slavery and human trafficking

V02: March 2020

Introduction from the Director

Over the last year, Gladstone Brookes has remained committed to our goal of acting fairly, ethically and transparently in everything we do. In 2019, Claims Management Companies transitioned to Financial Conduct Authority (FCA) regulation, under FCA regulation, our focus has remained on the Fair Treatment of all staff inclusive of our supply routes.

We have continued to observe the requirements of the Modern Slavery Act 2015 (the Act) and understand that they reflect the international drive to eradicate modern slavery in commercial organisations. Our aim remains 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 continue to consider this in the selection and ongoing 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 Policies 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 250 employees and agents worldwide and operate in the United Kingdom and South Africa.

Our business

We no longer take on new business relating to PPI. Our business is organised into 3 business units:

- **Pre-decision**

This unit deals with ongoing cases before a decision is issued by the lender.

- **Post-decision**

This unit deals with ongoing cases after a decision is issued by the lender.

- **Lead Generation**

This unit deals with the generation of leads for firms supplying other services within the sector.

- **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 ongoing 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 internally & in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring internally & in our supply chains.
- Monitor potential risk areas internally & 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 supply chain compliance programme consisting 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 risk of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff via our policy on this. [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.
- Confirmation of staff treatment, hours, breaks etc.
- Awareness regarding whistle blowing procedure.
- Number of breaches occurred

Further steps

In 2020, we have centralised our HR controls which will enable us to increase our internal visibility on modern slavery indicators. We will continue to review 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 2020.

Anthony Chorlton, Director.



SIGNATURE:

A handwritten signature in blue ink, appearing to be 'AD', is written over a faint, light blue circular watermark.

Gladstone Brookes Ltd

Date: March 2020.