



SQUARCLE MODERN SLAVERY &  
HUMAN TRAFFICKING STATEMENT  
2024

# Foreword

The collective challenges we face in the world today also provide opportunities for positive change. As an SME we recognise it is crucial that we show strong leadership and commit to creating a fairer world.

As an organisation, how we harness our impact for good is at the forefront of how we operate. We should use our impact to create value for our clients and success for our people, society, and the world around us. Thinking about the holistic value we deliver and the impact we have on clients, employees, partners, and communities is part of our commitment to being a responsible and ethical business. Protecting and enshrining human rights in how we operate, and encouraging others to do the same, is a critical part of that.

At Squarcle we maintain a commitment to respecting human rights, including the elimination of slavery and human trafficking in our supply chains and business operations. We seek to foster an environment where respect for the individual and their rights is at the heart of how we operate. We encourage any individual who has concerns about unethical behaviour in any part of our business or operations to speak up and to do so without fear of retaliation. We have put in place policies, processes, and procedures, to support this approach.

We have also extended this approach to clients and partners. Given the nature of our business, and the risk assessments that we have undertaken to date, we believe that the risk of slavery and human trafficking in our business is low. But we cannot be complacent and are always reviewing how we can improve and evolve in response to changing circumstances. Our intention is always to be thoughtful and targeted in how we select and engage with our suppliers.

I am determined that we will continue to bring these values and commitments to life in our own business, and in our work with our clients to support the elimination of slavery and human trafficking. It is in this context and in accordance with the Modern Slavery Act 2015<sup>1</sup> that we publish our 2024 Modern Slavery Act Transparency Statement. This statement allows everyone in Squarcle to do their bit to drive real change.

As the Chief Executive Officer of Squarcle I am determined that our enterprise plays a decisive part in tackling modern slavery.



**Gavin Emmerson MBE – Chief Executive Officer**

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<sup>1</sup> Modern Slavery Act 2015 - GOV.UK ([www.gov.uk](http://www.gov.uk))

# Introduction

This statement outlines the robust processes and controls Squarcle have in place to ensure human trafficking and modern slavery do not take place in any part of our business or supply chain. This statement covers the financial year to 31 March 2025.

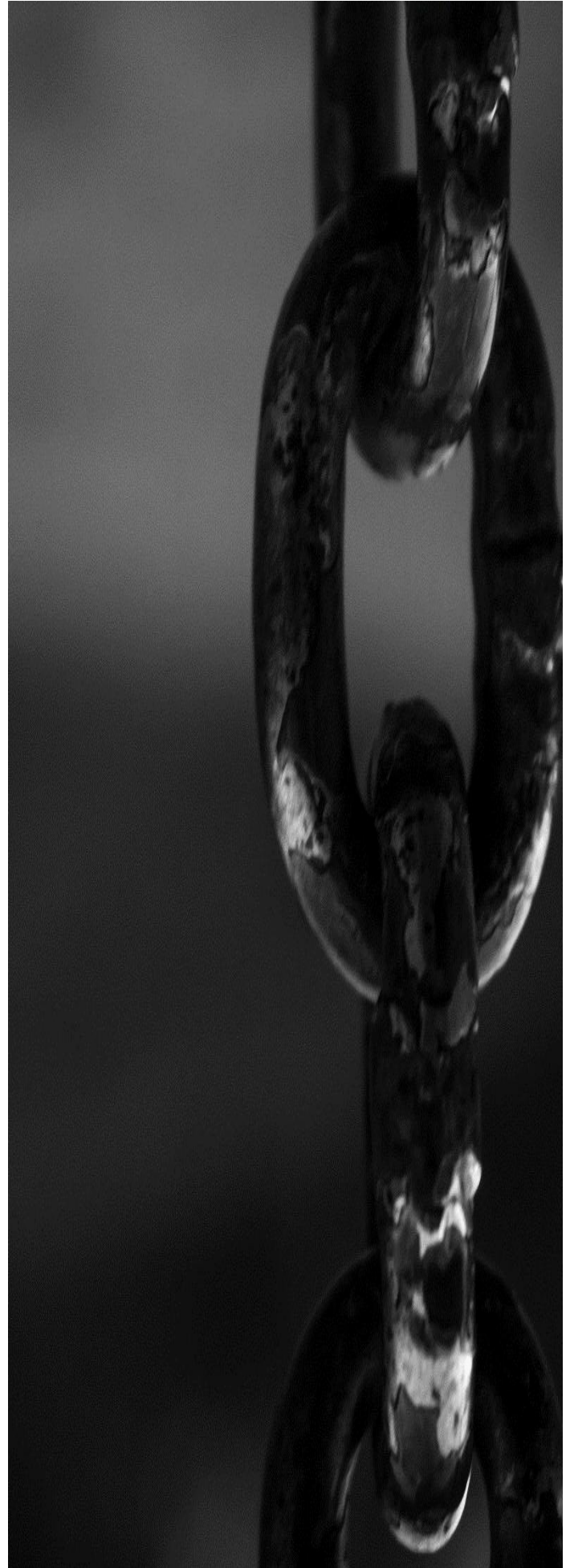
Squarcle is committed to safeguard against modern slavery and ensure it does not take place within our organisation. We will collaborate closely with our suppliers to ensure they too recognise their responsibility to maintain slavery free operations and deliver the standards we expect of them.

- **This statement provides Squarcle Risk Assessment and Management;**
- **Key Performance Indicators (KPIs) to Measure Effectiveness of Steps Being Taken;**
- **Training on Modern Slavery and Human Trafficking.**

## Organisational Structure and Supply Chains

Squarcle Consulting Limited is a Small to Medium Enterprise (SME) operating in the UK. We are a provider of supply chain, digital, data and management consultancy services to clients in a wide variety of industries and market sectors, including government, consumer products and retail. Our head office is in Bristol, United Kingdom.

Our supply chains include the procurement of (i) general business services, for example, corporate services and specialist advisors; and (ii) sub-contractors and associates who provide niche and technical support for our client engagements.





# Policies in Relation to Modern Slavery and Human Trafficking

We aim to identify and mitigate the risk of slavery and human trafficking taking place in our business. Squarcle maintains a Policy Governance Framework to ensure that compliance to all policy is verified and meets the requirements of law and risk appetite of the business.

Relevant policies for modern slavery and human trafficking prevention include:

- Standards of Business;
- Responsible Procurement Code;
- Anti-bribery and Corruption;
- Equality and Diversity;
- Whistleblowing;
- Ethics;
- Recruitment.



# Due Diligence

Establishing a risk-based due diligence framework enables Squarcle to better identify potential modern slavery risks within our organisation and supply chains. Day-to-day due diligence is managed by our Operations and Compliance Team.

As part of the onboarding process for new suppliers, we conduct risk searches to identify any red flags or areas of concern. The Global Slavery Index<sup>2</sup> identifies Electronics (laptops, computers, and mobile phones) as one of the top risks imported products in the UK. We will therefore monitor this area carefully and undertake further assessment to better understand our exposure.

## Risk Assessment and Management

Policies, processes, and procedures are in place to:

- Mitigate the risk of slavery and human trafficking occurring within Squarcle by ensuring full compliance with UK Visas and Immigration “right to work” checks;
- Monitor and address any emerging issues of concern and protect whistleblowers.

To assess the risk of modern slavery, we use the following processes with our suppliers:

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistleblowing.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.
- After consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, to investigate any complaints.
- We require the businesses we work with to publish a modern slavery statement.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all our suppliers are members of appropriate industry bodies and working groups.

Staff are encouraged to bring any concerns they have to the attention of management ASAP.

## Effectiveness of Steps Being Taken

Based on the potential risks we have established the following KPIs. These are regularly assessed by our board of directors:

- The percentage of suppliers who provide their own modern slavery statements:
- The effectiveness of enforcement against suppliers who breach policies:
- The amount of time spent on audits, re-audits, spot checks, and related due diligence:

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<sup>2</sup> [Global Slavery Index](#)

- the level of modern slavery training and awareness amongst our staff.

We benchmark our indicators against industry best-practice to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

## Modern Slavery Training

Our staff receive training to raise awareness and support that is appropriate to their role. In particular:

- Our leadership team receive training in identifying and resolving concerns around modern slavery and human trafficking:
- Our HR personnel, and staff involved in our procurement and supply chains undertake training that includes guidance around modern slavery and human trafficking, as well as other wider human rights issues:
- All our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this staff are encouraged to discuss any concerns they have. Training is refreshed regularly as necessary.

Communication and awareness of this policy our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. The policy is communicated to all employees and training provided where appropriate. Employees are expected to familiarise themselves with the statement which is also available on the company website.



*Gavin Emmerson*

Chief Executive Officer

14 October 2024