

## Citation Modern Slavery Statement

### 1. Introduction

Citation is committed to carrying out business responsibly, this includes ensuring that slavery and human trafficking are not taking place in any part of our business or supply chain.

This statement is intended to provide details of the steps that we have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Citation has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity in all business dealings and to safeguard against any form of modern slavery taking place within the business or our supply chain.

### 2. Our organisation

Citation Ltd helps small and medium-sized businesses by providing tailored Health & Safety and HR & Employment Law support.

Our highly qualified experts help companies across all industries, throughout the UK.

### 3. Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical manner. These include:

- a) Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- b) Recruitment & HR. We operate robust recruitment and eligibility to work practices throughout the recruitment and selection process. The team is trained to look out for and identify potential warning signs/indicators of modern slavery.
- c) Public Interest Disclosures Policy (held in the colleague handbook). We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

### 4. Our approach to assessing and managing risk

We conduct a regular review of our material suppliers and assess whether any particular risks of slavery or human trafficking arise.

We do not consider that our key relationships with professional or business services suppliers give rise to material risks in this area.

The biggest risks which we consider as potentially arising within our business are in relation to facilities management, catering, and the supply of office electronic equipment.

We manage the risk through the use of reputable suppliers and we have specifically requested that all of our material and regular suppliers in these areas confirm that their own business activities do not involve slavery or human trafficking.

## **5. Our effectiveness in combatting slavery and human trafficking**

Within our own business, we have identified a small number of suppliers in higher risk areas with an annual spend in excess of £50,000. We reach out to those suppliers and conduct due diligence on their compliance with the Modern Slavery Act.

We will continue to monitor and engage with all our material suppliers on the steps they are taking over the next year.

Anyone working for Citation (employees, workers, volunteers, contractors etc.) will be requested to complete MSA training in order to raise awareness and ensure everyone knows the part they play in preventing it.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Citation's slavery and human trafficking statement for the financial year ending 31 December 2017.

This statement was approved by Andrew Pumphrey on 18<sup>th</sup> September 2019.



**Andrew Pumphrey**  
**Managing Director**