

Sancroft.

Modern Slavery Statement

About Sancroft

Sancroft is an independent sustainability consultancy that provides high quality strategic advisory services to a diverse group of clients. Our mission is to enable meaningful environmental, economic, and social impact on behalf of our clients and help them realise their most positive contributions to people, planet, and growth through sustainable business practices. This includes advising clients on how to identify, prevent and remediate human rights harms, including modern slavery, in their businesses and value chains.

Our commitment to responsible and sustainable business practices extends to the management of our own business. Sancroft has been recognised as a certified B Corporation, an EcoVadis Platinum company, and is a member of the UN Global Compact. We are committed to upholding internationally recognised human rights and standards, both in our direct operations and within our supply chain, including the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

The risk of modern slavery in our business and supply chain

As a small professional services firm, directly employing a high skilled workforce, the risk of modern slavery occurring in our direct operations is extremely low. Our greatest exposure to modern slavery arises through the purchase of goods and services to run our business. Based on our experience advising clients on managing human rights and modern slavery risks, we understand that our highest risk categories of spend include IT equipment, facilities management services, furniture and office supplies, and consumables.

Sancroft recognises that modern slavery exists in many different sectors across the world, including in the UK and in the products and services we procure. We therefore acknowledge the need to take steps to prevent and mitigate the risk of modern slavery from occurring.

Policies and processes

Sancroft has developed a number of policies and processes to prevent exploitation of people in our direct business and in connection to our purchasing of goods and services.

Our Labour Policy sets out our policies to prevent modern slavery in our direct operations. This includes commitments such as:

- Sancroft will not use or support the use of forced, bonded or involuntary labour. Employees are free to leave after giving reasonable notice in line with their contracts.
- Sancroft does not support the use of child labour. Where we engage young people between the ages of 15 – 18 on purely educational experience programs, working hours shall not exceed 9:00 – 17:00pm.
- Sancroft ensures employees, including interns, are paid at least the London living wage, committing to equal pay for men and women for equal work. Deduction to wages shall not be made for disciplinary purposes.

Our Procurement Policy sets out our commitment to consider and limit the potential negative environmental and social impacts of our purchases, including modern slavery.

Our purchases of goods and services are guided by but not limited to the following principles:

- Preference for environmentally or socially beneficial products and services
- Sourcing from diverse local suppliers where possible

- We commit to seeking suppliers who strive to maintain high standards in their own operations and to paying suppliers on time in accordance with invoicing terms
- Suppliers should not require non-professional migrant workers to bear any costs associated with recruitment
- Suppliers should be compliant with the requirements of the UK Modern Slavery Act where relevant
- Suppliers should not employ workers under the minimum legal working age. Where workers under the age of 18 are employed, this should not be in hazardous conditions or interfere with any mandatory education.

We encourage everyone within the business to raise concerns in good faith under this policy. As set out in our Whistleblowing Policy, individuals must not suffer any detrimental treatment such as dismissal, disciplinary action, threats or any other unfavourable treatment connected with raising a concern. All new employees are made aware of our policies and are required to confirm that they will comply with it.

Review

This statement will be reviewed regularly to monitor its continued relevance and compliance with appropriate regulation and has been reviewed and approved by:

Date: 03 January 2024

Adopted on behalf of Sancroft International Limited by:

Judy Kuszewski, Chief Executive