

ANTI SLAVERY AND HUMAN TRAFFICKING STATEMENT

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ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

SECTION 1 – STATEMENT SUMMARY

At Peregrine Risk Management, we believe every person has the right to work freely, safely and with dignity. Modern slavery and human trafficking are serious crimes and human rights abuses. They have no place in our organisation, our supply chains, or our partnerships.

We recognise that exploitation can be difficult to see. It can occur through subcontracted labour, unethical recruitment practices, or extended supply chains that sit beyond an organisation's immediate view. For that reason, we do not treat this as a document-only exercise. We treat it as an area of active governance and control, with clear accountability, practical due diligence, and a requirement to act when concerns arise.

We take a zero tolerance approach to modern slavery, human trafficking, forced labour, servitude and exploitation. We also take zero tolerance to inaction. Where credible concerns are raised, we require that they are reported, assessed and responded to promptly, fairly and confidentially. Our approach is survivor-centred, meaning safety, dignity, confidentiality and wellbeing take precedence over reputational or commercial considerations.

SECTION 2 – WHO WE ARE AND HOW WE OPERATE

Peregrine Risk Management is a UK-based risk management, intelligence, training and specialist advisory firm. We work primarily with public sector bodies, universities and commercial organisations to help them understand, manage and reduce risk relating to safety, security, duty of care and resilience.

Our business is professional-services led. This means that most of our work is carried out by directly employed professional staff who have been recruited, vetted and trained by us. We do not operate labour-intensive production, manufacturing, extraction, agriculture or logistics functions, and we do not rely on large volumes of temporary or low-skilled labour.

Where specialist skills, regional knowledge or technical capability are required, we work with a limited number of carefully selected subcontractors and technology partners. These partners extend our capability, but they do not replace our responsibility. We remain accountable for how work is delivered, who delivers it, and whether our standards are upheld.

Our main supplier and partner categories include the following

- Specialist security and intelligence contractors
- Software, data and analytics providers
- Training and e-learning platforms
- IT and cloud infrastructure providers
- Corporate support services such as legal, HR and finance

The majority of these suppliers are based in the UK and operate under UK regulatory and legal frameworks. In some cases, particularly in relation to specialist technology or international intelligence sources, we engage overseas suppliers. These relationships are treated as higher risk from a modern slavery and human rights perspective and are subject to enhanced due diligence and oversight.

Although our direct workforce is professional and relatively low risk for modern slavery, we recognise that risk does not disappear simply because it is indirect. It can exist within subcontracted labour, recruitment practices, and extended supply chains. We therefore approach modern slavery risk as a governance and oversight issue, not just a workforce issue.

SECTION 3 – OUR POLICY AND STANDARDS

We maintain a formal Anti-Slavery and Human Trafficking Policy approved by our Board of Directors. This policy applies to all employees, contractors, suppliers and business partners. It sets out our expectations, standards and responsibilities in relation to preventing, identifying and responding to modern slavery and exploitation.

The policy is built around a small number of clear and non-negotiable principles.

First, we have zero tolerance of modern slavery, human trafficking, forced labour, servitude and exploitation in any form. This applies whether the activity is direct or indirect, intentional or negligent, within our own operations or within our supply chains.

Second, we have zero tolerance to inaction. Where credible concerns arise, they must be reported and they must be acted upon. Failure to raise or respond to concerns is treated as a serious matter.

Third, our approach is survivor-centred. If someone may have been harmed, their safety, dignity, confidentiality and wellbeing come first. We do not prioritise commercial, reputational or contractual interests over the protection of people.

Fourth, we commit to fair process. Concerns are handled confidentially, assessed objectively and investigated independently and proportionately. Retaliation against anyone who raises a concern in good faith is not tolerated.

These principles are not abstract. They are reflected in practical standards that apply across our business and supply chain.

Fair payment

We require that no worker pays to access work, that wages are paid directly to the worker, that unlawful deductions are prohibited and that debt bondage is not tolerated.

Freedom

We require that employment is freely chosen, that people are able to leave employment in accordance with lawful contractual terms, and that identity or immigration documents are not withheld.

Working and living conditions

We require that working conditions are safe, lawful and meet applicable standards. Where accommodation is provided by a supplier, it must also meet legal and safety requirements.

Culture and transparency

We promote an open culture where people are encouraged and supported to raise concerns, where reporting routes are accessible and confidential, and where issues are addressed rather than ignored.

Roles and responsibilities

Our Board has overall accountability for this area. Senior management is responsible for implementation, oversight and review. Managers are responsible for ensuring their teams understand and comply with expectations. All staff, contractors and suppliers are required to adhere to these standards.

The policy is issued to all staff during induction, referenced in contracts with suppliers and subcontractors, reinforced through training and internal communications, and reviewed periodically to ensure it remains effective and appropriate.

SECTION 4 – HOW WE IDENTIFY AND MANAGE RISK

We recognise that the risk of modern slavery within our organisation does not primarily arise from our directly employed professional staff, but from the points where our business connects with wider labour markets and global supply chains. In practice, this means that our main areas of risk exposure are indirect rather than direct.

We identify the highest risk areas as:

- Subcontracted and agency labour
- Recruitment practices that could create dependency or debt
- Overseas suppliers operating in different legal or regulatory environments
- Extended service, technology and data supply chains that involve multiple tiers of providers

We therefore take a risk-based approach, focusing our attention and controls on the areas where exploitation is most likely to occur and where we have less immediate visibility or control.

Risk identification begins at the point of engagement. When we consider a new supplier, subcontractor or partner, we assess what type of service they provide, whether they employ or supply labour, where they are based, and what legal and regulatory frameworks they operate under. This allows us to classify suppliers by inherent risk and determine the level of due diligence and oversight required.

Risk management is then continuous rather than one-off. It involves ongoing monitoring of supplier performance, responsiveness to concerns, and any changes in operating context such as geographic expansion, changes in ownership, or changes in the way labour is sourced or managed.

Where higher risks are identified, we apply enhanced controls. These may include additional information requests, closer monitoring, contractual safeguards, more frequent review, or direct engagement with the supplier to understand and improve their practices.

Importantly, our approach to risk management is not purely contractual or punitive. Where possible, we seek to work with suppliers to raise standards and address issues. However,

where standards cannot be met, or where a supplier is unwilling to engage constructively, we will terminate the relationship.

SECTION 5 – DUE DILIGENCE IN PRACTICE

Due diligence is the practical mechanism through which our standards and risk approach are put into effect. It is embedded into our recruitment, procurement, contracting and project governance processes rather than treated as a separate or one-off compliance exercise.

Supplier and partner due diligence

Before we engage a supplier or subcontractor, we undertake proportionate checks to understand who they are, how they operate, and whether their practices align with our standards.

This includes:

- Reviewing the nature of their services and whether they involve labour provision
- Considering the countries and sectors in which they operate
- Assessing whether they use recruitment agents or labour intermediaries
- Requiring acceptance of our ethical and modern slavery standards
- Including contractual clauses on compliance, audit rights and termination

Where a supplier operates in a higher-risk sector or geography, or where labour is being supplied rather than services or technology, we apply enhanced scrutiny. This may include requesting additional information, conducting more detailed reviews, or engaging directly with the supplier to understand their practices.

Recruitment and workforce due diligence

For our own workforce and for any labour supplied to us, we carry out right-to-work and identity verification in line with UK law. We do not use fee-charging recruitment agents and we do not permit recruitment practices that could create debt, coercion or dependency.

We ensure that employment is voluntary, that terms are clear, and that people are free to leave in accordance with lawful contractual arrangements.

Ongoing monitoring and review

Due diligence does not end at the point of onboarding. We monitor supplier relationships over time, paying attention to changes in operating context, performance issues, complaints, or any signals that standards may be slipping.

We also review our own controls periodically to ensure they remain appropriate to our risk profile and operating environment.

Where concerns arise, they are escalated, investigated and responded to in line with our reporting and response processes.

SECTION 6 – REPORTING AND RESPONDING TO CONCERNS

We believe that the ability to raise concerns safely and to have them taken seriously is one of the most important safeguards against exploitation. For that reason, we place significant emphasis on creating an environment where people feel able and supported to speak up.

Anyone working for, with or alongside Peregrine Risk Management can raise a concern about suspected modern slavery, human trafficking or exploitation. This includes employees, contractors, suppliers, partners and, where relevant, third parties affected by our operations.

Concerns can be raised through several routes to ensure accessibility and choice. These include raising the issue with a line manager, contacting HR, speaking to a designated safeguarding or ethics lead, or using confidential whistleblowing routes. We do not require people to follow a single rigid process, and we respect that individuals may feel more comfortable using different channels.

All concerns are treated seriously, handled sensitively and managed confidentially. Reports are acknowledged, logged and assessed to determine the appropriate response. Where a concern relates to a potential victim, immediate attention is given to safety and support needs.

Investigations are carried out fairly, proportionately and independently, with care taken to avoid harm, intimidation or retaliation. We do not tolerate retaliation against anyone who raises a concern in good faith, regardless of whether the concern is ultimately substantiated.

Where exploitation is identified, we focus first on ensuring that affected individuals are safe and supported. We then take appropriate action, which may include engaging with suppliers to remediate issues, strengthening controls, reporting to relevant authorities, or terminating relationships where necessary.

SECTION 7 – MEASURING EFFECTIVENESS

We recognise that simply having policies and procedures is not enough. What matters is whether those controls are working in practice, whether they are identifying risk, whether people feel able to use them, and whether they lead to meaningful action.

For that reason, we monitor a range of indicators that help us understand both the effectiveness of our controls and where improvements may be needed.

These include quantitative indicators such as training completion rates, the proportion of suppliers and partners that have been risk assessed, the number and nature of concerns raised, the time taken to investigate and close cases, and whether remediation actions have been completed.

We also pay attention to qualitative signals, such as feedback from staff and partners, themes emerging from concerns or investigations, and changes in the external risk environment that may affect our exposure.

These indicators are reviewed by senior management and inform decisions about whether controls need to be strengthened, whether training needs to be refreshed or targeted differently, and whether particular areas of the supply chain require greater scrutiny.

Importantly, we do not treat the absence of reported concerns as evidence that risk does

not exist. We recognise that under-reporting can itself be a risk indicator, particularly where people do not feel safe or able to speak up. We therefore look at reporting trends in context and alongside other information.

SECTION 8 – TRAINING AND AWARENESS

Training and awareness are central to our approach, because people are the first line of defence against exploitation. Policies and processes only work if those who use them understand what modern slavery looks like, why it matters, and what to do if they have concerns.

All staff complete mandatory modern slavery and safeguarding awareness training through e-learning. This training explains what modern slavery and human trafficking are, how they can arise in different sectors and contexts, what warning signs to look out for, and how to raise concerns safely.

Staff in roles that involve higher exposure to risk, such as management, procurement, supplier oversight and safeguarding, receive enhanced training. This focuses on risk identification, due diligence, how to handle disclosures sensitively, and how to escalate concerns appropriately.

Training content is reviewed and refreshed regularly to ensure it remains current, relevant and aligned with emerging risks, legal developments and operational learning.

We reinforce training through internal communications, leadership messaging and reminders about our standards and reporting routes. This helps to maintain awareness over time and signals that this is an area the organisation takes seriously.

Our objective is to build not only knowledge, but also confidence — confidence to recognise potential exploitation, to raise concerns, and to trust that those concerns will be handled properly.

SECTION 9 – GOVERNANCE AND OVERSIGHT

Modern slavery and human trafficking are treated as governance and risk issues, not simply as compliance topics. This means they are subject to oversight, accountability and review at senior levels within the organisation.

The Board of Directors has ultimate responsibility for ensuring that the organisation takes reasonable and proportionate steps to prevent, identify and respond to modern slavery risk. This includes approving the Anti-Slavery and Human Trafficking Policy, reviewing this statement, and receiving assurance that controls are operating effectively.

Senior management is responsible for implementing the policy, maintaining operational controls, ensuring that due diligence is carried out, and that concerns are handled appropriately. They are also responsible for reviewing effectiveness indicators, learning from incidents, and driving continuous improvement.

Managers have a responsibility to ensure that their teams understand their obligations, complete required training, and escalate concerns when they arise. They also play a key role in maintaining an open and supportive culture where people feel able to speak up.

Modern slavery risk is considered as part of our wider organisational risk governance, alongside other operational, legal and ethical risks. This ensures it is not isolated, deprioritised or treated as a one-off issue.

SECTION 10 – EXTERNAL STANDARDS AND ASSURANCE

We recognise that internal governance, while essential, benefits from being aligned with credible external standards and subject to appropriate external scrutiny.

Peregrine Risk Management is a signatory to the International Code of Conduct Association. This reflects our commitment to internationally recognised standards relating to human rights, humanitarian law and responsible business conduct, particularly in relation to security-related activities.

Being a signatory means that we commit to operate in line with these principles, to cooperate with oversight processes, and to engage constructively where concerns or gaps are identified. It also provides a framework against which we can test and strengthen our own practices.

We also monitor relevant guidance and expectations from government, regulators and industry bodies in relation to modern slavery and human trafficking and adjust our controls and processes accordingly.

Our objective is not only to meet minimum legal requirements, but to maintain practices that are robust, credible and capable of standing up to scrutiny from clients, regulators, civil society and the public.

SECTION 11 – LOOKING AHEAD AND CONTINUOUS IMPROVEMENT

Modern slavery and human trafficking are not static risks. They change as business models evolve, as supply chains become more complex, as technology enables new forms of intermediation, and as geopolitical and economic pressures shift. We therefore recognise that our approach must also continue to evolve.

We are committed to regularly reviewing our policies, controls and practices to ensure they remain effective, proportionate and appropriate to our operating environment. This includes reviewing this statement annually, updating training content, strengthening due diligence where risks increase, and learning from incidents both within our organisation and in the wider business environment.

We also recognise that addressing modern slavery is not something that any organisation can do alone. It requires collaboration with suppliers, clients, industry peers, regulators and civil society. We aim to engage constructively with others, share learning where appropriate, and use our influence to encourage higher standards across our networks.

Our long-term objective is not only to prevent harm within our own operations and supply chains, but to contribute to wider efforts to reduce exploitation and protect vulnerable people.

Signed:



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