

MODERN SLAVERY STATEMENT

This statement applies to Concero UK Ltd, (referred to as the Company) relating to the financial year 2020/21, outlining our commitment to combatting slavery and human trafficking in our business and supply chains, this statement is made to assist with compliance with the Modern Slavery Act 2015.

Definitions

The Company considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

As our Company has a turnover of less than £36 million, we do not have a legal obligation to produce a modern slavery statement. However:

- a. We agree that exploitation within all supply chains ending in the UK is a blight on our society, and we are committed to playing our part in eliminating exploitation;
- b. We understand that customers with obligations under the Modern Slavery Act 2015 cannot comply with those duties without our cooperation.

To that end, we confirm that we have examined our own business and, to the extent that it is reasonably practicable, businesses within our supply chain and we confirm the following:

1. We confirm that within our own business, no relevant offence relating to slavery or human trafficking has been committed.
2. We have made enquiries of businesses that supply directly to us and we are confident that no relevant offence is committed in that business.
3. Insofar as it was reasonably practicable, we have examined our supply chains and confirm that we found no evidence within any other organisation which knowingly supports or is found to involve itself in slavery, servitude, forced or compulsory labour or human trafficking.

Organisational Structure

Our business structure operates from one centralised office local to the main business of the Company whose work is carried out wholly within the UK. Field-based employees spread across multiple locations within the UK, work within or travel to schools or clients on a daily basis.

The main activity of the Company is conducted with the education sector and is centred around the educational calendar. However, the Company operates all year round and would not be regarded as seasonal demand.

Supply Chains

In order to fulfil its activities, the main supply chains of the Company include those related to [state nature of Company's supply chains – describe what the business does]. The Company has conducted significant due diligence and review of its suppliers to ensure that the supplier register is accurate and current. Whilst the Company has not to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery, in accordance with section 54(4) of the Modern Slavery Act 2015, steps may be taken including termination powers in the event that a supplier fails to respond or comply with our procedures. This however does not imply that there is any suspicion of them being involved in modern slavery, but that the Company is unable to identify and assess any potential risks by using them in the supply chain.

We understand that certain industry sectors and geographical regions entail greater risk of exploitation than others. We do not believe that our supply chain is in one of those sectors.

Where it is reasonably practicable, we ensure that businesses in our supply chain have made a similar statement relating to slavery and human trafficking. We also encourage all employees to report on any matters relating to slavery or human trafficking in our supply chains of which they become aware.

Impact of Covid-19

During the reporting period covered by this statement, the Covid-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of Covid-19. This created several challenges for the Company, as it did for others across the nation. The Company in spite of this period remains in a position to publish its statement for the financial year 2020/2021 in line with publishing requirements.

The Company concludes that the Covid-19 pandemic did not adjust the risk of modern slavery to a level above or position which existed before the pandemic. Moreover, there were no prolonged or significant adjustments to labour requirements during this time which meant that the Company had to source additional temporary labour. Homeworking measures were swiftly implemented where practicable meaning that the main premises from which the Company usually conducts its day-to-day business, was temporarily closed.

During the pandemic, the Company's employees still had access to the grievance procedure to raise any concerns that they may have had. In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it had not been possible to accommodate temporary homeworking. **The Company took the decision from the outset of the pandemic to ensure that all of the workforce who were required to self-isolate in accordance with public health guidelines continued to receive full pay during their absence.**

Policies

The Company's values support its stance on modern slavery and the commitment to eradicating it, as do a number of Company policies; **recruitment policy, equal opportunities, supplier code of conduct, vehicle policy, expenses policy.**

Responsibility

Whilst the Company does not have any obligation to produce this statement, any concerns relating to modern slavery should be addressed to compliance@concerouk.com.