



HAWTHORN

Modern slavery and human trafficking statement

This statement outlines the approach that Hawthorn Advisors Holdings Ltd and our subsidiaries have taken to prevent slavery and human in our business and supply chain for financial year ending March 2022.

Because we have a turnover of less than £36 million, we are not obliged to make this statement under section 54 of the UK's Modern Slavery Act 2015. However, we are committed to taking action on this serious issue and to follow best practice in the identification, management and mitigation of risks.

Our business and supply chain

We are a leading strategic communications consultancy, based in the UK and working for clients globally, with approximately 70 employees, serving clients across a range of sectors. The majority of our operations and procurement spend is within the UK, although on occasion we do travel and run events on behalf of our clients outside of the UK.

Our direct supply chain includes suppliers of goods and services across the following main categories:

- Cleaning equipment and supplies
- Furniture and fittings
- Utilities and supplies
- Facility maintenance and supplies
- Catering supplies and services
- ICT equipment and services
- Paper, stationery, books, newspapers, magazines and subscriptions
- Printing and design services
- Professional contractor and consultancy services
- Recruitment agencies
- Transport and travel services

Our commitment and policies

We do not permit, condone or otherwise accept any form of slavery or servitude, forced or compulsory labour, human trafficking, or any other forms of exploitation and child labour, in line with the definitions provided in the UK's Modern Slavery Act 2015. This commitment extends to all our employees, contractors, subcontractors, agents, partners, and any other organisation, entity or individual with whom we engage or do business.

We are committed to playing our part in combatting any modern slavery and human trafficking in the business and in our supply chain, and to ensuring that we minimise the likelihood of these risks occurring, wherever possible and

we understand that clients with obligations under the Modern Slavery Act 2015 cannot comply with those duties without our cooperation.

This commitment forms part of our Code of Conduct that ensure we follow the highest standards of ethics, professionalism and business conduct, ensuring that we as a company and our employees act in strict compliance with the law.

Due diligence

We are confident that within our own business, no relevant offence relating to slavery or human trafficking has been committed. As a professional services business operating primarily within the UK, we also consider ourselves to have a comparatively low risk of slavery and human trafficking within our direct supply chain when compared with companies operating in other sectors.

We believe that the most significant risks we face of slavery and human trafficking occur in areas that are beyond our oversight and direct control – particularly within our indirect supply chain for goods sourced by third parties from geographies with higher risks of these issues, such as with ICT equipment or agricultural products. We also recognise that there may be higher direct risks with contractors involved in facilities management and cleaning services.

To the extent that it is reasonably practicable, we conduct due diligence and engage with businesses in our direct supply chain to confirm that no relevant offences have been committed under anti-slavery laws, that they are not under investigation for such an offence, have put in place controls to comply with anti-slavery laws, and effectively manage circumstances with a higher risk of anti-slavery offences. Through this process, we have found no direct evidence pointing towards any incident of slavery or human trafficking.

We continue to conduct regular due diligence to ensure that this remains the case, in line with our risk assessment and mitigation process.

Risk assessment and mitigation

Where it is reasonably practicable, we ensure that businesses in our supply chain have clear commitments and have made public statements relating to slavery and human trafficking, and we seek to work with companies that share our own values in this area.

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, as part of our Code of Conduct.

Further steps the business is considering implementing in future include:

- Standard questionnaires of compliance for new suppliers
- Enhanced due diligence and recording process for suppliers, with a focus on supply chains which are at particular risk of slavery or human trafficking

- Further staff training
- Ethical suppliers being encouraged to take part in tender processes.

Training

Our Code of Conduct are outlined in our Employee Handbook, which is provided to all staff as part of the induction process, with refresher training on ethical and compliance issues including anti-slavery and human trafficking provided on a periodic basis.

Additional training in greater depth is provided to the key employees and contractors with particular responsibility for oversight of business operations and procurement. This is so that they are aware of specific indicators and risk factors that may require additional due diligence on slavery and human trafficking, related to sectors, geographies, and supply chains.

Supervision

The person in our business responsible for assessing matters relating to slavery and human trafficking is the Chief Operating Officer, Anna Maria Clarke. This statement has been reviewed and approved by the senior management team of the company and by the CEO, John Evans.