

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 2021.

The IAM is committed to ending slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Executive Summary:

As an exemplary professional services firm IAM is committed to addressing modern slavery risks in our business and our supply chain. This statement describes the actions taken to address these risks during the calendar year 2021.

This year, the Coronavirus (COVID-19) pandemic continues to impact business and employees. We have worked to consider and manage these impacts for our people, our suppliers and their personnel and other stakeholders.

This, our primary modern slavery statement, sets out how we have:

- Introduced mandatory modern slavery training, including for all new joiners in the future;
- Included information on modern slavery as part of our supplier on-boarding materials;
- Adopted a firm approach to client risk management

No infringements or violations have been identified this year in our operations or supply chain. Our processes and due diligence did not flag a single instance and we will continue to develop and strengthen our approach whenever and wherever possible in the coming year and are committed to:

- Continue to extend transparency and due diligence over our supply chain;
- Review and update our third party risk management process

In a final statement, we are committed to upholding and respecting the human rights of our people and all individuals with whom we interact; in line with the UN Global Compact and the UN Guiding Principles on Business and Human Rights and the OECD Guidelines on Multinational Enterprises.

Policies and Governance

2.1 Operations

Our Human Rights Policy sets out our position in line with internationally recognised human rights principles, which include modern slavery. It is hosted on our website and circulated via digital communications. All our staff are required to comply with the Human Rights Policy, as part of their annual performance review.

The Human Rights Policy is embedded in our culture through our Code of Conduct and sets the tone at every level of our organisation.

Accountability for human rights and modern slavery relating to our business resides with John Butterfield, our Chairman. Responsibility for day-to-day management of the programme is led by David Fordham. An annual review of its effectiveness is conducted together with internal stakeholders responsible for risk management and procurement.

The statement is reviewed by senior management and presented to the Executive Board before being approved by the Supervisory Board.

Internal Audit ensure the disclosures made in the Modern Slavery Statement and related supporting processes are in line with supporting evidence provided.

2.2 Suppliers

Our partner agreement template creates a contractual obligation on the supplier to comply with the Global Third Party Code of Conduct and all applicable laws. In a minority of instances agreements may be adjusted to place equal obligations on the supplier.

All other contracts with our partners will, wherever possible, contain similar concepts. We acknowledge that no agreement will cover every situation and that a contractual obligation does not necessarily guarantee compliance.

As set out in our Human Rights Policy, where a human rights violation is identified, we work vigilantly and diligently with all parties involved to ensure victims have access to justice and compensation. We also investigate the root cause and take any measures necessary to prevent recurrence. In the event of an unsatisfactory response we will terminate the contract.

3. Due Diligence

We communicate our expectations to employees and partners with regards to human rights and modern slavery, and use various tools to monitor standards.

3.1 Operations

We recognise that our key asset is our people, so we never rest when it comes to securing a safe, fair and inclusive workplace.

All employees are asked to declare that they have read and understood our Code of Conduct, which makes clear the types of behaviours we expect.

Our SpeakUp email is available to any individual who comes across unethical behaviour displayed by an employee or third party. The email is shared by way of a number of channels, including posters, performance reviews, and human resource email signatures.

Efforts are made to raise awareness of slavery through mandatory training and onboarding materials.

3.1 Partners

Despite the risk of further lockdowns we will continue to work closely with partners, including learning centres, to minimise the financial impact on partners and provide stability.

Human rights is central to our supply chain approach and is included as part of our annual feedback report. Due diligence is performed at every stage of the procurement cycle, from initial evaluation to contract management and ongoing relations.

We apply an annual sustainability survey to monitor the overall performance of our main suppliers and partners. Where we identify potential improvements we offer our support in addressing them.

Our aim is to increase visibility of working practices that promote human rights.

4. Risk Assessment and Management

Although professional services may not typically be considered a high risk field for modern slavery, we are committed to our risk identification and mitigation processes.

4.1 Suppliers Providing Services

For supplier personnel in the UK risks are relatively low due to the legislative context. Given we operate in an international context the need remains for us to remain vigilant, and in particular to closely observe vulnerable groups. We expect all suppliers to adhere to our standards.

Typical suppliers of services would include airlines, hotels, waste disposal software providers.

4.2 Suppliers Providing Goods

The main risks associated with our procurement of goods tend to be indirect. We are transparent about our expectations towards third parties adopting measures and policies to protect human rights.

Typical suppliers of goods would include cleaners, caterers, promotional merchandise, and IT hardware.

5. Training

The effectiveness of our human rights and modern slavery programme is dependent on our personnel having a clear understanding of the subject, as well as its importance and value.

During 2022 we will continue mandatory training for our employees. We have also committed to revisiting and refreshing modern slavery training on a triennial basis.

In 2023 we plan to launch a microsite where our people can report issues, propose improvements, and access advice and support on matters related to modern slavery risks.

Activities and commitments aiming to uphold human rights and tackle modern slavery are communicated using a variety of channels.

Our Commitments

This year we aim to enhance our modern slavery programme. We will set new commitments as the year progresses and make progress on those currently ongoing. Below is a summary of our actions to date and some of our new commitments to help us make an everlasting contribution towards this important topic.

	Date set	Commitment	Status	Comment
Supply chain	2022	Continue to extend transparency over related processes	Ongoing	Extensive due diligence has been conducted and will continue
	2022	Review our end to end third party risk management process	New	Help to further embed modern slavery risk management into our culture
Training	2022	Introduce mandatory training	Complete	Mandatory training module developed and delivered to existing staff
	2022	Add modern slavery information to supplier onboarding	Complete	Includes a definition of modern slavery and our commitment to addressing it
Effectiveness	2022	Monitor and report on related metrics	New	Monitoring metrics will provide an indication of the overall effectiveness of the programme