

# Modern Slavery Statement

This statement is made as part of Astraeus Consulting Limited's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Astraeus Consulting Limited (Astraeus) operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified, how we monitor them, and how we train our staff.

## 1. Statement period

This statement is published in accordance with section 54 of the Act and relates to the year 1 January 2024 to 31 December 2024. It was approved by the Board of Directors on 21 February 2024.

## 2. Our business

Astraeus offers dynamic and high-impact consultancy services which catalyse enterprise transformation and drive its acceleration. Our services enable organisations to keep up with the pace of technological change – empowering innovation, amplifying value creation, delivering improved business outcomes, and transforming services for people and communities alike.

### 2.1 Who we work with

All the businesses that we work with and the consultants we deploy, are known to and identified by our staff. The companies that we work with are generally located in the UK and Europe. The consultants we deploy are primarily based live in the UK and Europe.

### 2.2 Other relationships

Astraeus works with the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com)).

## 3. Our policies

In addition to this statement, Astraeus has the following policies which incorporate ethical standards for our staff.

- Corporate social responsibility
- Ethical business practices policy (which includes our policy on Human Rights)
- Anti-bribery policy

### 3.1 Policy development and review

Astraeus's policies are established by our senior leadership team, based on advice from HR professionals, industry best practice, and in consultation with the Company's Group Legal Counsel. We review our policies annually, or as needed to adapt to changes.

## 4. Our processes for managing risk

Policies, processes, and procedures are in place to:

- Mitigate the risk of slavery and human trafficking occurring within Astraeus by ensuring full compliance with UK Visas and Immigration (UKVI)
- Monitor and address any emerging issues of concern and protect whistle blowers.

**To assess the risk of modern slavery, we use the following processes with our suppliers:**

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistleblowing.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.
- After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

**Additionally, we have taken the following steps to minimise the possibility of any problems:**

- We reserve the right to conduct spot-checks of the businesses who supply us, to investigate any complaints.
- We require the businesses we work with to publish a modern slavery statement.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all our suppliers are members of appropriate industry bodies and working groups.

**Our staff are encouraged to bring any concerns they have to the attention of management.**

## **5. Our processes for managing risk**

**Based on the potential risks we have identified, Astraeus has established the following key performance indicators, which are regularly assessed by our board of directors**

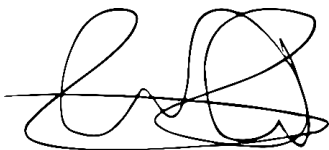
- The percentage of suppliers who provide their own modern slavery statements.
- The effectiveness of enforcement against suppliers who breach policies.
- The amount of time spent on audits, re-audits, spot checks, and related due diligence.
- The level of modern slavery training and awareness amongst our staff.

Based on the potential risks we have identified, Astraeus has established the following key performance indicators, which are regularly assessed by our board of directors

## 6. Our training

Our staff receive training and support that is appropriate to their role. In particular:

- Our leadership team receive training in identifying and resolving concerns around modern slavery and human trafficking.
- Staff who are involved in our procurement and supply chains undertake training that includes guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.



Greg Coleshill, Chief Executive Officer

<i>Version number</i>	<i>Author</i>	<i>Revision description</i>	<i>Date</i>
4.0	Sarah Phillipps	Company name update/annual review	March 2024