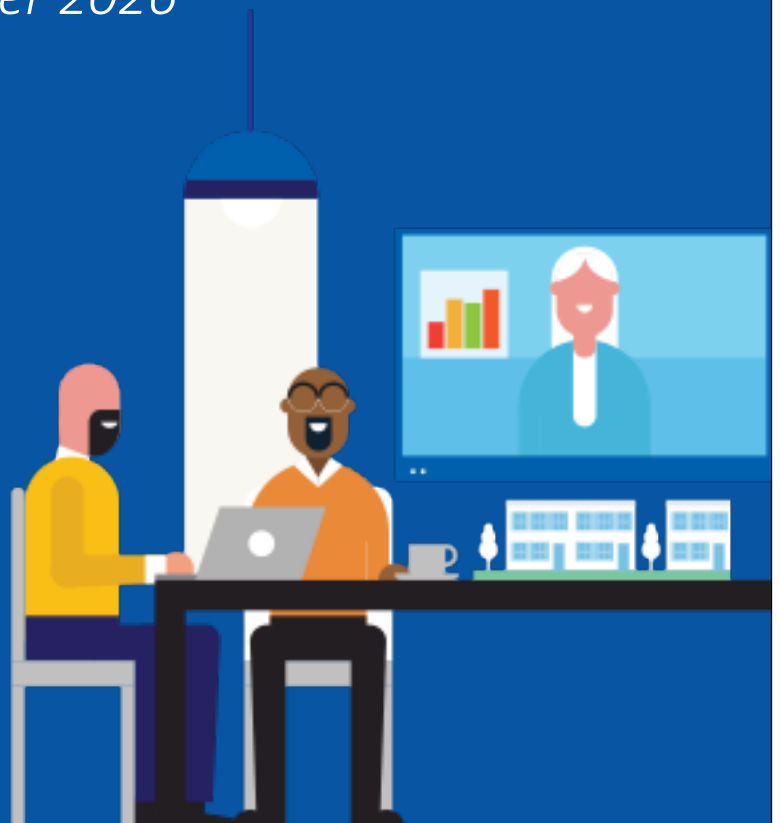


Campbell Tickell: Modern Slavery Policy (Anti-slavery & Human Trafficking)

October 2025

Next Review – September 2026



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1. Policy statement

- 1.1 This policy sets out Campbell Tickell's ("CT") approach to preventing modern slavery and human trafficking in our business and supply chains, and the steps we take to support compliance with the Modern Slavery Act 2015.
- 1.2 CT's principal objective is to provide consultancy and advisory services, as well as permanent and interim recruitment. We work to the highest professional standards and comply with all laws, regulations, and rules relevant to our business, and we expect the same from our suppliers and business partners.
- 1.3 The majority of our supply chain comprises professional firms, consultants and contractors providing services. We have continued to assess the nature and extent of our exposure to modern slavery and maintain a proportionate approach to managing this risk.
- 1.4 We have concluded that our risk is low and undertake due diligence proportionate to this risk. Further detail on our risk assessment and due diligence approach is set out in section 4. Training on modern slavery forms part of the induction process for all individuals who work for us.
- 1.5 We have intrinsic core values around equality, diversity and inclusion and corporate responsibility. In addition to our Modern Slavery Policy, we have a Whistleblowing Policy which employees can utilise if they have concerns about any wrongdoing or breaches of the law or regulations.
- 1.6 Over the next review period, we will continue to update our risk assessment and associated reporting, review supplier commitments at onboarding and renewal where appropriate, maintain training for new joiners, review our policy programme, and continue embedding a zero-tolerance approach to modern slavery.
- 1.7 This policy and statement has been formally approved by the Partners of CT and will be reviewed in line with CT's policy review cycle.

2. Responsibility for this policy

- 2.1 The Partners have overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- 2.2 The Partners and other senior managers have day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

3. Compliance with this policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 As part of our approach, we have systems in place to:
- Identify and assess potential risk areas in our supply chains;
 - Mitigate the risk of slavery and human trafficking occurring in our supply chains;
 - Monitor potential risk areas in our supply chains; and
 - Protect whistleblowers.
- 3.3 The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our organisation or supply chains at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred, or that there is a risk of a breach occurring, you must notify your manager, Human Resources, Operations or a Partner, or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.6 If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains may constitute any form of modern slavery, you should raise this with your manager, Human Resources, Operations or a Partner.
- 3.7 We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our organisation or in any of our supply chains.
- 3.8 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they should inform Human Resources immediately. If the matter is not remedied, an employee should raise it formally using our Grievance Procedure.
- 3.9 This policy does not form part of an employee's contract of employment and may be amended at any time.

4. Risk assessment and due diligence

- 4.1 We have undertaken an organisation-wide risk assessment to assess the nature and extent of our exposure to modern slavery. We have concluded that our risk is low because our supply chain is primarily made up of UK-based professional service providers, consultants and contractors. We undertake due diligence proportionate to this risk.
- 4.2 We ask suppliers to provide their published modern slavery statements, where available, as evidence of their commitment to helping prevent modern slavery and human trafficking.

- 4.3 Smaller suppliers, who are not required to maintain a statement by law, are asked to demonstrate their commitment to our own policy and standards.
- 4.4 A copy of the risk assessment is maintained internally.

5. Training and awareness

- 5.1 We are committed to providing training on this policy and on the risks our organisation faces from modern slavery, both within our organisation and in its supply chains. Training forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary. Staff are expected to familiarise themselves with this policy and raise any concerns promptly.
- 5.2 Our commitment to addressing the issue of modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breaches of this policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.