

Modern Slavery Act Statement

Behaviour Lab is a values-driven organisation and we aspire to meet the highest professional, legal, and ethical standards. Having committed to the United Nations Global Compact, Behaviour Lab supports the protection of internationally proclaimed human rights, the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Beyond our own firm, we take seriously our commitment to assist organisations and grassroots initiatives that promote human rights and tackle forced labour and child labour practices. At Behaviour Lab we are committed to The Modern Slavery Act 2015 ensuring our practices are effective in combating slavery and human trafficking. We have a responsibility to be alert to the risks, however small, in our business and in the supply chain.

Our Policy On Slavery And Human Trafficking

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

As an financial services business with a comparatively straightforward supply chain, we regularly review our supply chain which comprises predominantly of large businesses and technology providers. We have concluded that there is a limited risk of slavery and human trafficking in our supply chain.

We recognise that we engage certain suppliers who employ lower-wage staff which may present a higher risk of slavery and human trafficking. Nevertheless, we remain committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

We operate a Whistleblowing policy that encourages staff to report any suspicion of wrongdoing including of criminal offences without fear of recrimination.

Due Diligence Processes For Slavery And Human Trafficking

We continue to use the following steps to identify and mitigate risk in our supply chain:

- Identify, assess and monitor potential areas of risk in our supply chain.

- Mitigate the risk of slavery and human trafficking occurring in our supply chain.
- Ensure an annual senior management review of our anti-slavery and human trafficking policy.
- Protect whistle-blowers.

Supplier Adherence To Our Values

We have zero tolerance to slavery and human trafficking. We expect our suppliers to adhere to the same high standards as us. To ensure those in our supply chain and contractors comply with our values, we analyse our supply chain with a risk-based approach and obtain:

- assurance that suppliers have appropriate procedures/policies in place; and
- identification of those suppliers who provide some services in locations other than the UK or EEA.

Training

To embed further an understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we are developing specific guidance for staff as part of our wider ethical training programme.

Our Effectiveness In Combating Slavery And Human Trafficking

Our outsourcing oversight function, in conjunction with our HR and Operations teams monitor how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chain and report any concerns to senior management for remedial action.

All staff are responsible for communication and relationship management with our direct service providers to ensure their understanding of, and compliance with, our expectations.

Further Steps

We will continue to monitor the effectiveness of the steps we have taken to prevent slavery or human trafficking in our supply chain and will review the Modern Slavery Act statements made, where applicable, by our suppliers to ensure they meet our expectations.

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