

# **Modern Slavery Corporate Statement**

#### Introduction

CMC Partnership Global Ltd. provides change management training and advisory services. A Small Medium Enterprise (SME) registered in the UK, CMC Partnership Global Ltd can demonstrate a successful track record of providing high quality services to both private and public sector businesses, in the UK and globally. We are strongly committed to being a responsible business and maintain standards in line with ISO9001, ISO14001 and ISO27001.

## **Commitment to the Modern Slavery Act 2015**

As a company we are committed to ensuring that there is no modern slavery or human trafficking within our supply chains. We will not knowingly engage with any third party involved or associated with modern slavery or human trafficking. While the concept of slavery and human trafficking may seem less relevant to a training and advisory focussed SME, we believe the issue should not be ignored and have ensured that we have suitable procedures in place.

## What is Modern Slavery?

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. A full definition of modern slavery is available at **Annex A**.

## **Corporate Responsibility**

CMC Global's directors take responsibility for ensuring CMC's compliance with all applicable laws relating to anti-slavery and human trafficking, including the Modern Slavery Act 2015, and review this topic on a regular basis.

## **Summary of Relevant Corporate Procedures and Processes**

Our Purchasing Procedure is set within the context of our commitment to promote corporate sustainability. The procedure promotes business-wide quality, ethical and environmental practices, including consideration of modern slavery. We review supplier commitment to and compliance with the Modern Slavery Act 2015 as part of our supplier management process, which includes our prequalification process, risk assessment, approval procedure, and ongoing supply chain management. This statement is supported by our **Whistleblowing Policy**. We encourage all our employees, customers, and any other business partners to report any concerns related to the direct activities or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

#### **Corporate Risk Assessment**

Our Modern Slavery Risk Assessment has demonstrated that the risk to our business is currently minimal as summarised below.

 We do not operate in a context where modern slavery is prevalent: our services are delivered through individuals who are known to us and assessed on a one to one basis through a robust screening and interview process.



- Our purchasing is minimal as we are a professional services organisation. Major purchases are carried out in accordance with our established purchasing procedure, which includes consideration of Modern Slavery as well as other ethical and environmental considerations.
- Our supply chains include publishing and printing services, IT and software services, conference and venue suppliers, consultants, and marketing and PR services. We have reviewed the risks that these supply chains can present and whilst we consider our exposure to modern slavery to be limited, we expect our suppliers and contractors to demonstrate a zero-tolerance approach to exploitation.

Business risks we have considered in assessing and managing risks to workers include:

- **Country risks:** We are a global organisation with our Head Office in the UK and satellite offices in Singapore, Switzerland, and South Africa. Employees in these countries are selected following the same recruitment and interview process as in the UK. Our work is delivered using employees or known and trusted associates.
- **Sector risks:** As we provide advisory and training services within professional sectors, the sector risk has been deemed minimal.
- Transaction risks: We use one of the large, established banks in the UK, Singapore, Switzerland, and South Africa, so the risk has been deemed minimal.
- **Business partnership risks:** All our supplier relationships are individually risk-assessed. Each supplier has an assigned service manager who is responsible for managing the relationship and reviewing on a regular basis.
- Due Diligence Measures:
  - New staff joining CMC are introduced to our Modern Slavery Statement during the Induction process.
  - A requirement to comply with Anti-slavery legislation is included in our supplier agreements.
  - Service managers are assigned to oversee supplier relationships and manage any risks, reviewing these on a regular basis.
  - All major purchases are signed off by the Board of Directors.

## Approved by:

Name: Michael Campbell

Title: MANAGING DIRECTOR

Date: March 2022 (reviewed)



## **Annex A: Modern Slavery Definition**

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. The offences are set out in section 1 and section 2 of the Act, which can be found at:

https://www.legislation.gov.uk/ukpga/2015/30/part/1https://www.legislation.gov.uk/ukpga/2015/30/part/2

## Definition of Slavery and Servitude

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed through the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Definition of Forced or Compulsory Labour Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

## Definition of Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here: <a href="https://www.legislation.gov.uk/ukpga/2015/30/section/3">https://www.legislation.gov.uk/ukpga/2015/30/section/3</a>