

MODERN SLAVERY 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 31 December 2022.

Whitetree Group Limited and Whitetree Resourcing Limited ('the Company', 'we', 'us' or 'our') is committed to preventing 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.

Organisational structure

Whitetree Group Limited has business operations in the United Kingdom.

We operate primarily as consultants in the defence, ITC and security sectors. The nature of our supply chains is as follows: We work with a number of key direct suppliers, who provide us with goods, such as equipment for our premises, and services, such as outsourced business processes, IT software and marketing services.

For more information about the Company, please visit our website: www.whitetree.co.uk.

Policies and processes

The Company is committed to continued policy development to ensure that we keep up to date with all changes in legislation, including full compliance with the Modern Slavery Act.

It is a condition of our tendering and contracting process that all key sub-contractors can demonstrate full adherence to key employment legislation. This aims to ensure that the welfare and well-being of all employees working or participating on our programmes are fully protected.

As part of our high value/risk tender processes, all major sub-contractors are required to warrant to the charity that they are fully compliant with all employment, equality and environmental legislation and that, where applicable, they are compliant with the annual reporting requirements contained within section 54 of the Modern Slavery Act.

We have a wide policy framework that supports the aims of the Modern Slavery Act:

- Anti-Fraud, Bribery and Corruption Policy
- Whistleblowing Policy
- Grievance Policy
- Recruitment and Selection Policy
- Pay Policy
- Procurement and Contracting Policy
- Discrimination, Harassment and Bullying Policy
- Acceptance and Refusal of Donations Policy

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of the procurement and contracting process with all key sub-contractors and suppliers, The Company carries out detailed financial and legal due diligence checks for all large supply arrangements.

The Company carries out risk assessments for programmes and projects that are managed by the Company; this includes risk management measures such as contract risk registers and cross-functional team steering groups to ensure contract and risk oversight of all the programmes. These are constantly reviewed by senior management to ensure their continued effectiveness in managing any risk. Due to the nature of the sectors that the Company

operates in, and the close regulation and supervision these receive from UK Governmental departments, the likelihood of compliance issues occurring is very low.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

Risk and compliance

The Company completes an annual risk mapping exercise of current supply chains across all departments which includes a RAG rating of all key suppliers in relation to the risks of modern slavery. Where applicable we check all our key suppliers to ensure that they have a robust Modern Slavery statement in place.

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier. Creating an annual risk profile for key suppliers.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because our supply chain is based in the UK and in low-risk industries, such as services.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will train our staff about modern slavery issues and increase awareness within the Company.

Training our staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company. What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

Incidents in 2021

- To date, there have been no reported incidents of modern slavery by Whitetree or suppliers to Whitetree in 2021.


Planned activities

Over the next 12 months we will continue to build on the work already done to further develop our anti-modern slavery policies and procedures. Planned activities include:

- Creation of a standalone responsible procurement policy and related principles (including a Supplier Code of Conduct); we will raise awareness across the organisation by launching this via internal communication channels and externally via our website.
- Development of a supplier management framework to clarify roles and responsibilities and provide guidance on effectively managing key supplier contracts across the organisation.
- Providing specific Modern Slavery Act guidance to key individuals and teams across the organisation who are responsible for managing significant contractual relationships.

Approval

The statement was approved by the board of directors.



David Brown, Managing Director and Founder

Date: 20th January 2022