

## Modern Slavery Policy and Procedure

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## Modern Slavery Policy and Procedure

### Introduction

At MERCURI INTERNATIONAL (UK) LTD we are committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains (where applicable) are free from slavery and human trafficking.

This statement sets out MERCURI INTERNATIONAL (UK) LTD's actions to understand all potential modern slavery and human trafficking risks and to implement effective systems and controls.

As part of an international human resources business, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

### Our History

Swedish industrialist Curt Abrahamson founded Mercuri International in the 1960s motivated by a strong drive to empower organisations in making their strategy happen. The company started out of an association with Heinz Goldman of the Goldman Institute. The success of MERCURI INTERNATIONAL (UK) LTD's result focused methods turned this initially Scandinavian sales training company into the global player it is today.

MERCURI INTERNATIONAL (UK) LTD's success is a direct result of the work of our handpicked experts alongside with strong values and mission. Our achievements go side-by-side with those made by our clients. That is what makes us a leading player globally and locally.

MERCURI INTERNATIONAL (UK) LTD has been owned by Bure s.a., a Swedish investment company, since 1997. Through organic growth and acquisitions Mercuri Group has established itself as the leading Sales Consulting and Result Improvement company in the world

### Organisational structure and supply chains

MERCURI INTERNATIONAL (UK) LTD UK is a Global Sales Training and Consulting organization. We enable sales excellence by transforming organizations and empowering people to reach their full potential. Our customized, award winning solutions increase sales results and achieve sales excellence for our clients.

The MERCURI INTERNATIONAL (UK) LTD UK head office is in Henley-in-Arden, Warwickshire with sales training locations in London and Solihull. Mercuri's group headquarters are in Stockholm, Sweden.

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### Policy

MERCURI INTERNATIONAL (UK) LTD is fully aware of the responsibilities we have towards our clients/employers, learners, employees, communities and all stakeholders. We are guided by a strict set of ethical values in all our business dealings and expect our suppliers and supply chain to adhere to these same principles. We have zero tolerance for slavery and human trafficking. All employees are expected to report concerns about slavery and modern trafficking and management are expected to act upon them in accordance with our policies and procedures.

To continue to identify and mitigate the risk of modern slavery and human trafficking in our own business and our supply chain we are committed to the following:

- A review of the effectiveness of Modern Slavery briefings and to develop further awareness sessions, sharing any relevant actions with supply chains. This will include the following:
  - ✓ the basic principles of the [Modern Slavery Act 2015](#);
  - ✓ how employers can identify and prevent slavery and human trafficking;
  - ✓ what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
  - ✓ what external help is available, for example through the Modern Slavery Helpline - <https://www.modernslaveryhelpline.org/>.
- Relevant actions to be implemented to strengthen supply chain auditing and compliance, including a review of procurement and supply chain procedures and template documentation, introducing new or revised procedures as part of the procurement and Pre-Approved Suppliers process.
- Guidance and relevant e-learning modules to be shared across employees within MERCURI INTERNATIONAL (UK) LTD and its supply chain.
- Modern Slavery principles to be embedded in learning and development interventions.
- A revised Modern Slavery risk assessment to be introduced to support activity in this area and highlight any risks.
- Ensure recruitment and induction procedures are robust and inform new staff of the processes and procedures within MERCURI INTERNATIONAL (UK) LTD to prevent modern slavery.
- A review of all recruitment activity in line with safer recruitment principles.
- A review of existing supply chains as part of the supplier relationship management activities to ensure compliance with modern slavery legislation.
- A review of MERCURI INTERNATIONAL (UK) LTD Safeguarding Children's and Vulnerable Adults policy to incorporate any guidance relevant to the legislation and best practice guidance.

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### Our supply chains and supplier due diligence

*(At time of writing MERCURI INTERNATIONAL (UK) LTD do not employ or use the services of a supply chain other than short term, contracted Associates to support in the delivery of training and/or consultancy services. The following section outlines what MERCURI INTERNATIONAL (UK) LTD will do if they subcontract all or part of their Apprenticeship programmes)*

Our approved supplier due diligence process includes evaluating every new partner prior to engagement with any MERCURI INTERNATIONAL (UK) LTD delivery/services. Potential Supply Chain partners will need to complete a Supply Chain Management Application to become a Pre-Approved Supplier. This process includes questions on their recruitment and selection processes and vetting requirements, equality and diversity policies and actions, safeguarding procedures and arrangements, information security processes, quality systems and staff competencies and qualifications. Potential supply chain partners will be asked to confirm that modern slavery is not taking place anywhere in their business and that the necessary requirements are present in line with the Modern Slavery Act 2015.

MERCURI INTERNATIONAL (UK) LTD will also uphold best practice and professional codes of conduct relating to procurement and supply chain in line with the Chartered Institute of Procurement and Supply (CIPS).

MERCURI INTERNATIONAL (UK) LTD will be committed to following the [Merlin Standard](#) for supply chain management. We will also follow [DWP Merlin Standard guide for Providers](#) to implement best practice for developing, managing and supporting high-performing supply chains that integrate the public, private, and community and voluntary sectors. MERCURI INTERNATIONAL (UK) LTD will commit and promote this standard which is designed to support with the achievement of successful, high performing supply chains and champion positive behaviours and relationships in the delivery of provision.

Regular reviews of existing supply chains will be undertaken as part of our supplier relationship management activities including appraisals with key suppliers and assessment of compliance with modern slavery legislation.

Every year each approved supply chain partners will be prompted by MERCURI INTERNATIONAL (UK) LTD to update the information that they submitted in their original application. If any information expires and/or is not updated, or extra requested information is not provided, the supplier will be removed from the Pre-Approved Suppliers List. Any policies/due diligence documents which have been updated (most policies should be refreshed annually), including confirmation that there has been no change to the organisation's status, with specific regard to the declarations that were made.

MERCURI INTERNATIONAL (UK) LTD will assess any instances of non-compliance with its Modern Slavery and Human Trafficking commitments on a case by case basis and will tailor remedial action appropriately.

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### Board of Directors Statement

This statement has been approved by MERCURI INTERNATIONAL (UK) LTD's Board of Directors, who will review and update it on an annual basis.

This statement is also made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30<sup>th</sup> June 2019

### Signed

A handwritten signature in black ink, appearing to read 'Barry Hilton', with a long horizontal flourish extending to the right.

Barry Hilton

Managing Director

## Modern Slavery Policy and Procedure

### Version Information

Policy Title		Continual Professional Development Policy and Procedure	
<b>Policy version number</b>	MERUK-139		
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<b>New review date</b>	July 2020		
<b>Owner</b>	Quality Assurance		
Version History	Version date	Change summary	
	28/08/19	Document creation	