Modern Slavery Statement

**Introduction & purpose**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes our firm policy in respect of slavery and human trafficking.

**Group Structure**

We are a stand alone company registered as Gillis Risk Management Ltd under company number 15027436. There are no other companies in our group structure.

**Our Business**

Insurance Brokers

**Our Recruitment Suppliers**

The firm does not operate in an industry where modern slavery is prevalent but nevertheless is committed to taking steps to uncover any potential risks within its supply chain.

We are currently a new company so there are no plans to recruit any new staff in first year, however when we do it will be from people we know within the industry or from reputable insurance recruitment agencies with a stringent modern slavery policy.

**Our Policies**

This firm has various policies in place which aim to minimise the risk of modern slavery or human trafficking, and encourage reporting of any related concerns, including:

* **Code of Conduct**, our firm conducts business consistent with the highest ethical and professional standards and will not tolerate behaviour that deviates from those standards. Colleagues are expected to act with integrity, honesty, courage and to promote mutual respect.
* **Whistleblowing Policy**. Respect and a culture of openness in the workplace is a key aspect of the firm’s ethical policy and Code of Conduct. The firm encourages colleagues and other business partners to report any concerns, including any concerns relating to modern slavery or human trafficking.

The firm has a whistleblowing procedure which makes reporting easy and confidential.

**Training**

This Modern Slavery Policy has been rolled out to all staff involved in recruitment. It includes information on who staff should contact should they have any concerns.

There is additional training for those staff most likely to interact with supply chains with a potentially higher risk of encountering modern slavery.

Firm staff are encouraged to report any concerns or suspicions regarding the presence of modern slavery within the supply chain.

**Modern Slavery Policy**

1. **Application and Background**  
   This policy reflects the Firm’s obligations under the Modern Slavery Act 2015 and the Firm’s commitment more generally to avoid any form of modern slavery or human trafficking within its operations or its supply chain.
2. **What is Modern Slavery?**  
   Modern slavery includes:
   * Slavery – the behaviour on the part of the offender as if they owned the victim, depriving the victim of their freedom;
   * Forced or compulsory labour – work or service of a victim which involves coercion, either direct threats or violence or more subtle forms of compulsion. Work or service is extracted from the victim under the menace of any penalty and for which the victim has not offered themselves voluntarily; and
   * Human trafficking – arrangements for the travel of the victim with a view to them being exploited.

It is important to recognise that modern slavery is prevalent throughout the world and whilst less common, exists in the United Kingdom and other developed countries.

1. **Response to Modern Slavery**  
   The Firm will not tolerate any form of modern slavery within its own operations or within its supply chains.  
     
   You should notify your line manager or HR business partner as soon as possible if you have any concerns, issues or suspicions about modern slavery in any parts of the business or its supply chains.
2. **The processes in relation to the Firm's suppliers are set out below.**  
   The Firm aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Firm is committed to ensuring that 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 the Firm’s business or its supply chains.
3. **Modern Slavery and our Supply Chain**  
   The Firm deploys rigorous existing processes to assess and validate its vendors prior to making either a purchase from or a payment to a vendor. These checks are required of all vendors before the vendor can be added to the Firm's systems to allow payment to the vendor.
4. **Information and Training**  
   This policy has been distributed and communicated to all UK Firm staff who are involved in recruitment and these staff are expected to read this policy closely.  
     
   In addition, the Firm has arranged training for those staff most likely to interact with suppliers with a potentially higher risk of modern slavery.
5. **Responsibility for this Policy**  
   The HR department/compliance director has primary responsibility for monitoring the implementation of this policy, dealing with any queries about it and assessing its effectiveness.