



Modern Slavery Statement

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1. Organisation structure and supply chains

Peru Consulting Limited ('Peru') is a private limited company specialising in Management Consultancy Services with a focus on Information Technology.

As Peru continues to grow we are committed to ethical practices, not only in our business activities, but also the promotion of ethical practices across our supply chains and with our clients.

At the end of 2021, our company consisted of:

1x Chairman

4x Directors

4x Managing Consultants/ Senior Managers

9x Principal Consultants

7x Senior Consultants

2x Consultant

2x Analyst

2x Business Assistants

10 Associate Consultants

Our Board of Directors consists of the Chairman and Directors.

Our philosophy is to ensure all our employees ('Peruvians') are empowered to feel a shared responsibility for Modern Slavery obligations, and we should all promote our commitment through every interaction and engagement. Ultimate responsibility for approving our Modern Slavery Strategy falls to the Directors of Peru, thus showing the importance we place on the subject. Having no parent company nor subsidiaries afford Peru complete autonomy over the management of modern slavery practices, which we ensure are upheld by any contractors with whom we engage.

We primarily operate in the UK, however, have clients in other countries, such as Ireland, Switzerland and Australia. Peru Consulting continually seek to ensure perpetual compliance to our standard for ethical business practices is implemented throughout our direct supply chains, which consist mainly of MICE, hardware and software.

We have a low risk of modern slavery infringements both within our own labour force and that of our supply chains. Whilst we engage associate consultants either on a direct temporary basis, or through umbrella company, we always ensure any agent has the right to work in the UK and adopt a

strict adoption of ensuring each agent has a minimum of 'living wage'. In addition, we conduct robust due diligence on our own supplier base to ensure no risk of modern slavery occurring in our direct supply chains, and encourage our clients to conduct such activities, to support the prevention of breaches of the Modern Slavery Act.

2. Policies in relation to slavery and human trafficking

Modern slavery is a human rights violation and has severe consequences for the health and wellbeing of survivors. It is an exploitative crime that impacts on physical and mental health and has public health implications. It is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

2021 saw Peru's first implementation of our Modern Slavery Policy (the "Policy"), with training planned for all Peruvians over the course of the succeeding year, and is expected to be upheld by all Peru suppliers, business partners and contractors.

The Policy strongly aligns with the ETI Base code and draws upon the International Labour Organization ("ILO") standards to promote:

Freedom from forced labour

Freedom from child labour

Freedom from discrimination at work

Freedom to form and join a union and the right to bargain collectively.

The Policy has been approved by the Directors of Peru and will be promoted to all employees in due course, and is supported by additional commitments, such as the pledge to pay, as a minimum, living wage to all employees, agents and associates, and the 'Remote and Lone Working' 'Health and Safety', 'Code of Conduct' and 'Recruitment of Ex-Offenders' Policies, which seek to collectively provide adequate, equitable and safe working conditions for all employees, agents and associates.

All employees, agents and associates are able to access all Policies on Peru's internal intranet, or, if access is limited, they are provided copies directly. Relevant translation will be provided if the need should so arise, whether it be due to language, physical or mental challenges.

Peru provides all relevant personnel access and guidance on all policies, and regularly reviews to ensure relevance and adherence. In cases of breach, Peru will enforce its 'Disciplinary Policy' to the appropriate degree.

Where Peru is required to review a Third Party organisational policy, a Director's sign-off will be required to approve the acceptance of observance to such policy.

All Peru Policy's, commitments and pledges are approved by all Directors, without exception.

3. Due diligence processes

Peru is reviewing the current standardised process for due diligence on all business dealings and seeks to draft, approve, implement and train all employees, agents and associates once full established.

The due diligence process will formerly review suppliers, business partners and associates prior and during the engagement across areas such as (but not limited to):

Modern Slavery Policy

Modern Slavery infringements

Sanctions

Financial stability

Risk exposure (e.g. reputational, geographical, human rights etc) and

ESG commitments.

The process will be reviewed periodically, and Peru will seek to continuously improve its methodology and application.

4. Risk assessment and management

Peru has limited exposure to the risk of Modern Slavery in it's day to day business dealings, and to our knowledge we have not encountered, entered into a partnership with, nor had any associations with any organisation or individual whom has been in breach of international modern slavery standards.

If a risk was ever identified, either via formal routes, via the Whistle Blowing process, or informally suspected, the Board of Directors ("the Board") will be informed and will discuss how they intend to proceed. Formerly minutes of their agreed further action must be recorded, including responsibilities and accountabilities.

Following completion of the process, findings would be evaluated by the Board within an agreed timeframe and further action to report, further investigate or log will be agreed.

The Board will, as part of any risk review, agree on what constitutes a priority or tractable risk and ensure their application is proportionate to the size, capacity and degree of responsibility borne by Peru.

Should an associate, supplier or partner inform Peru of potential risks, they shall be advised on Peru's methods for prioritisation, the reasoning for such methods, and further action to be taken.

5. Key performance indicators to measure effectiveness of steps being taken

Ethical behaviour should be deeply embedded throughout any organisation, with everyone working responsibly together, and dedication derived and driven from all levels in the hierarchy.

Peru seeks to ensure all employees, agents and associates are fully aware of, trained in and adhere to our Modern Slavery Policy. We will run, as a minimum, one training session per annum, and expect all personnel to demonstrate an adequate level of knowledge in the form of a test, following such training.

Over the next twelve months, Peru will commit to the introduction of benchmarking the results of the post-training to identify how year on year improvements can be made, to further the knowledge and commitment of all personnel and thus measuring changes in awareness of modern slavery among all employees, not simply how many have attended training, but how valuable the training was in achieving its goal of awareness.

Peru will seek to complete due diligence activities on all supplier engagements, and following annual review create and implement further KPI's tailored to the specific actions on Modern

Slavery we have committed to, such as ensuring no bonded labour in any of our supply base.

From reviewing the KPI's and measurements on an annual basis, we will review business processes and practices to identify any areas for improvement, and, following the Board sign-off, implement accordingly.

Where applicable, Peru shall invite a third-party review of our practices in relation to Modern Slavery and seek findings which produce data to be used into continuous improvement to establish best practice.

6. Training on modern slavery and trafficking

Aside from the standard company-wide Modern Slavery training annual programme, which is provided by internal specialists via workshops, webinars, videos and eLearning; explicit in-depth training will also be offered to those in roles which may have higher risk exposure to modern slavery, for example, those who spend 50% or more of their working time on procurement and supplier relationship activities, and the Board.

The relevant personnel will be offered to complete the annual eLearning CIPS Ethical Procurement and Supply eLearning Programme and Test, which seeks to hone their skills and knowledge, and ultimately to demonstrate their commitment to ethical procurement and sustainable supply chains.

The objective of every training and development programme is to ensure adequate knowledge and commitment of all employees, agents and associates. Where further training needs are identified, this will be raised with the relevant line manager and addressed appropriately with further training.