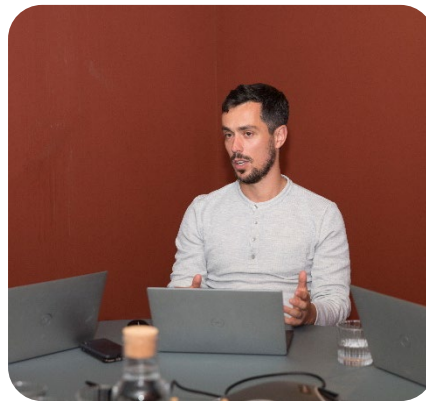


**TRANSPARENCY IN SUPPLY CHAINS (TISC)
ANNUAL SLAVERY AND HUMAN TRAFFICKING REPORT
OAKLIN CONSULTING LLP (INCL. OAKLIN LTD)
FY 2023 / 2024**



UK'S LEADING
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1. Organisation Structure, Business and Supply Chain

Oaklin is a full-service management consultancy business. We provide highly-skilled professional services to the private and public sectors, focused on bringing about lasting and successful change for our clients. We work with the utmost ethical, social, and commercial integrity, supporting our clients to define strategies, solve complex problems, design and structure their organisation, execute programmes of change, and make the best use of the latest digital technologies.

Oaklin Consulting (OC344976) is a limited liability partnership, which wholly owns Oaklin Limited (08651117). Both are registered in the UK at 45 Gresham Street, London EC2V 7BG.

As a professional services practice, Oaklin has a limited and simple supply chain that is almost entirely based in the UK. Where we do have a supply chain, it can be thought of in broadly four parts:

1. **Associates:** Where niche or specialist skills are required, Oaklin from time-to-time engages sub-contractors, known as Associates, to work with our core team to deliver services to our clients. The supply chain for associates is generally limited to the Associate themselves and any agency through which they are provided.
2. **Office space:** Oaklin occupies a leased office space in central London, and engages a range of ancillary support services including maintenance and cleaning.
3. **Business services:** Oaklin engages a small number of business support services, such as marketing agencies, IT and AV service providers, legal firms and accountancy firms.
4. **Partnerships:** Oaklin from time to time works alongside and in partnership with other complementary businesses, as part of a broader offering to our clients.

2. Policies

Oaklin has a clear and robust policies that require evidence of full compliance with:

- anti-slavery and human trafficking
- anti-bribery and corruption
- London living wage.

We have a zero-tolerance approach to any form of modern slavery or bribery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery or bribery are not taking place anywhere in our own business or in any of our supply chains.

Oaklin is also proud to be a member of the London Living Wage foundation and positively validates that all of our suppliers are fully compliant with the spirit and the specifics of the foundation's living wage objectives.



We are also committed to ensuring there is transparency in our own business and in our approach to sustainable social value, including modern slavery, throughout our supply chains. We are fully proactive and consistent with our disclosure obligations under all regulations, including the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. Where we have control over the terms and conditions used, we build in a right of inspection so that we can audit and validate compliance.

3. Due Diligence Processes

All new clients, suppliers, associates and partner organisations are validated through a strict due-diligence process before being onboarded and engaged. Our supplier due-diligence includes specific checks on a supplier's policies on, and approach to, slavery and human trafficking. It also includes evidence that they comply with anti-bribery regulations and pay all of their staff, including interns and temporary staff, the London Living Wage – no exceptions.

We conduct wider validation of the new company, its structure, history, financial and other factors to ensure that the supplier is an established and reputable business with no ties to state-actors that are subject to sanctions. We include a right of inspection into our core supplier terms or ask for positive confirmation of compliance when engaging on theirs. We also preferentially use local suppliers, even if this costs a little more.

Specific due diligence with regard to slavery and human trafficking includes:

- Review of slavery and human trafficking policy.
- Review of Slavery and Human Trafficking Statement under sect. 54, Modern Slavery Act 2015 (if available).
- Implement specific contractual clause on slavery and human trafficking.
- Implement specific contractual clause to pay the London Living Wage.

Wider due diligence includes:

- General information – such as Articles of Incorporation, business licenses, proof of location, company structure, subcontractors, and DBS clearances for individuals who help with client work or are engaged to perform services at our offices.
- Financial information – tax documents, loans, other liabilities, and principal owners.
- Reputational factors – negative news reports, overt political agendas, customer and employee reviews, reports from agencies, existence of any employee tribunals, links to high-risk state actors.



- Insurance – general liability, cyber insurance, and insurance specific to the services that are being procured.
- Cybersecurity risks – compliance reports, recent penetration testing reports, any existence and history of data breaches and security incidents.
- Operational risks – litigation history of company and key individuals, business continuity and disaster recovery plans.
- Policy review – evidence of the existence of an Information security policy, privacy policy, change management policy, vendor management policy, data retention and destruction policy, ESG policy, physical security policy, modern slavery policy, anti-bribery policy, and London Living Wage policy.

4. Slavery and Human Trafficking Risks

Slavery and Human Trafficking risks are regularly reviewed as part of Oaklin's wider Environmental, Social and Governance (ESG) risk management approach and are included as standing agenda items at Oaklin's monthly board meetings. Any new ESG risks are raised and reviewed by the Directors and noted at the monthly Board meeting, or more urgently if necessary. Any risks and mitigation actions are captured in the minutes of the Board meeting, and assigned to a member of the Leadership Team for positive action, monitoring, and eventual closure.

Oaklin's risk assessment policies and procedures are proportionate to our size, structure, location and the nature of our business and supply chain. These are kept under review and are adjusted as necessary. We are ISO97001 certified.

Whilst the risks of slavery and human trafficking Oaklin's business and supply chain are very small, those parts that represent the greatest risk are outlined below. Oaklin takes extensive measures to identify, manage and mitigate these risks.

5. Training and Capacity Building

Oaklin's Anti-slavery and Human Trafficking Policy is clearly documented in the Staff Handbook, with training on this policy, and on the risk our business faces from modern slavery in its supply chains, forming part of the induction process for all individuals who work for us. Regular training is provided as necessary.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Each employee is made aware, as soon as they join Oaklin, that:



- They must ensure that they read, understand and comply with this policy
- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- Employees must notify a Director as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy., If they turn out to be mistaken we celebrate the thinking and the desire to ensure compliance.

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