

Cairneagle – Modern Slavery Act 2015: Statement

Monday, 08th March 2021

Introduction

At Cairneagle, we believe transparency is the best way we can ensure our clients, customers, future investors, and the public, that we are doing our best as an ethical corporate company. In that spirit, we have published our first annual statement for Modern Slavery, made in compliance with section 54 of the Modern Slavery Act 2015.

Where there is no legal requirement for Cairneagle to provide a slavery and human trafficking statement, we aspire to be open and transparent about our recruitment practices, our policies and procedures in relation to modern slavery, and to take steps that are consistent and proportionate to our sector and size.

Our business

Cairneagle is a strategy and transformation consulting firm mainly focused on Education. We are a firm of four highly involved partners, supported by a core team of talented and capable consultants. We support strategic decision-making working with Chief Executives and Boards of educational institutions and companies supplying services to the sector, as well as private equity firms. We help our clients make significant and lasting improvements to their performance and realize their most important goals. Approximately 50% of our work is international in character, split between helping UK clients internationalise and working for overseas clients.

For further information about Cairneagle please visit our website www.cairneagle.com

Our supply chain

Our supply chain comprises primarily services that include professional advisory services (research companies, insurers, lawyers, accountants and other consultants). Therefore, we believe the overall risk of modern slavery is low owing to:

- The nature of the goods and services which we buy – services from mostly skilled professions.
- The locations from which we obtain them.
- Our obtaining methods, as we agree to reasonable terms and ensure timely payment.

Other suppliers might relate to the provision of administrative and non-revenue related services as cleaning companies, employment agencies, IT support providers, off-site storage, Software Systems and equipment providers.

Our Mission, Culture and Values

Our policies on slavery and human trafficking

There is no success without integrity. At Cairneagle, we are committed to doing the right thing, and this constantly drives our decisions. We are deeply passionate about the work we do in our sectors, and we strive to continuously grow our expertise, while increasingly enabling sector development through thought leadership and other initiatives.

For that reason, we are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our internal policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

Inclusion and Equality

At Cairneagle, we are focused on creating a supportive environment for career development that rewards excellence regardless of who you are, and our aim is to make sure all opportunities are transparent to our people while empowering everyone to learn and progress.

Consequently, we are committed to equality of opportunity in employment and oppose all forms of unlawful discrimination in all areas of our business. We aim to take every step possible to ensure that individuals are treated fairly and equally and that our recruitment and progression decisions are based on objective job-related criteria and our principles of meritocracy.

Training

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we provide awareness training to those of our employees who have responsibility in relation to engaging suppliers and provide an introduction of our commitment to staff who join us. For that reason, we have created a competency framework that outlines the behaviours that are valued, recognised and rewarded within our organisation. With **Embedded Integrity** being the first key attribute on our list, we are committed to qualities such as being ethical, honest, trustworthy and transparent, and having emotional awareness, genuine respect and best intentions crucially contribute to preventing any form of discrimination or modern slavery.

Next steps

Following a recent review of our processes we continue to take the following further steps to prevent slavery and human trafficking:

- Seek assurance from suppliers that their and their supply chains comply with the Modern Slavery Act 2015 and Human Rights Act 1998.
- Raise awareness of the Anti-Slavery and Human Trafficking Policy and Supplier Code of Conduct with our employees and suppliers.
- Contractual agreements to contain provisions requiring supplier's assurances of compliance with modern slavery and human trafficking laws.
- Undertake an assessment and review of our policies periodically.
- Provide additional training for employees, as necessary.
- Integrate any learnings from Covid-19 into our future strategy.

Statement

This statement is made in accordance with section 54 of the Modern Slavery Act 2015. It constitutes Cairneagle's modern slavery statement for the financial year ending April 05, 2022 and was approved by the partners of the company on March 15, 2021.



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