

# Modern Slavery and Human Trafficking Statement

## Introduction

This statement sets out Barbourne Brook's commitment to preventing modern slavery and human trafficking in all aspects of our business. Although our operations are not linked to the physical supply of goods or materials, we recognise our responsibility to remain vigilant, act ethically, and uphold the principles of the Modern Slavery Act 2015.

As a professional services firm, we remain alert to any risks, however small, that may arise through our business relationships or day-to-day operations. All employees are encouraged to raise concerns without delay, and we are committed to acting on them appropriately.

## Our Business Model

Barbourne Brook is a UK-based professional services company that provides expert advisory support in the form of customs consultancy to companies engaged in international trade. It delivers customs duty planning and associated services, and our proprietary customs analytics software.

We do not produce, distribute, or sell physical goods or engage with suppliers in the conventional supply chain sense. Our operations are entirely service-based and delivered through our in-house team of professionals. We operate exclusively within the United Kingdom.

## Our Commitment and Responsibility

Barbourne Brook does not consider its operations to be at high risk of modern slavery or human trafficking due to the nature of its services, staffing model, and lack of third-party suppliers. However, we take a zero-tolerance approach to any form of modern slavery and human trafficking and are committed to maintaining transparency and accountability in all our relationships.

Responsibility for our anti-slavery efforts is held by the Directors, who oversee policy development and ensure our internal practices meet high ethical standards. Their responsibilities include:

- **Policy Development:** Maria Jenkins, Director, Chief People Officer ensures our policies reflect best practice and remain relevant to our business activities.
- **Monitoring:** Sarah O'Neill, Executive Assistant, supports internal compliance and monitors for any recruitment or third-party engagement risks.
- **Training and Awareness:** Senior leadership is responsible for promoting awareness across the team and ensuring that reporting channels are accessible and trusted.

## Training and Awareness

Although our risk exposure is low, Barbourne Brook promotes employee awareness regarding human rights, ethical business conduct, and the implications of modern slavery. Any new employee is briefed during onboarding, and all staff are encouraged to review this policy annually.

## Company Policies and Ethics

Barbourne Brook's ethical stance is reflected in the following internal policies:

- **Whistleblowing Policy:** The policy encourages staff to raise concerns about unethical or unlawful behaviour in a protected and confidential manner.
- **Code of Conduct** – Outlines the professional behaviour expected from all employees, including ethical decision-making and respect for human rights.
- **Equal Opportunities Policy** – Ensures fair treatment and prohibits discrimination or exploitative practices across the organisation.

All policies are reviewed annually and updated as necessary.

### Due Diligence

In the rare event that Barbourne Brook enters into contracts with external consultants, software vendors, or professional service providers, we assess their credibility and ethical standing before engagement. Any third-party partner is expected to uphold equivalent standards and comply with relevant UK legislation, including the Modern Slavery Act 2015.

### Performance Monitoring

Given our low exposure, we do not apply formal key performance indicators (KPIs) specific to modern slavery. However, our effectiveness is assessed through:

- Clear communication of reporting procedures to all staff.
- Ongoing review of internal policies.
- Monitoring of any third-party engagements for ethical risks.

### Review and Approval

This statement is reviewed annually by the Directors and forms part of Barbourne Brook's ongoing commitment to ethical and responsible business practices.

**Approved by Maria Jenkins**

**Director**

**Barbourne Brook**