

# Modern Slavery Statement

## 1. Introduction

Whilst at present only Citation Ltd has a legal obligation to publish its' MSA Statement, the Group is committed to carrying out business responsibly and therefore has in place a Statement and Policy that applies to all Group colleagues. Citation Ltd employees will continue to adhere to the Citation Ltd policy.

The purpose of this statement is to ensure all Group companies (even if not obliged to publish a statement) follow our principles of acting ethically and with integrity.

This statement is intended to provide details of the steps that we have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Citation Group has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity in all business dealings and to safeguard against any form of modern slavery taking place within the business or our supply chain.

## 2. Our organisation

The Citation Group helps small and medium-sized businesses with their quality and compliance needs. Our highly qualified experts help companies across all industries.

## 3. Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical manner. These include:

- a) Anti-slavery policy. This policy sets out The Citation Group's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- b) Recruitment & HR. We operate robust recruitment and eligibility to work practices throughout the recruitment and selection process. The recruitment team is trained to look out for and identify potential warning signs/indicators of modern slavery.
- c) Public Interest Disclosures Policy (held in our internal policies and procedures such as the handbook). We operate a Whistleblowing Policy so that all colleagues know they can raise concerns about the treatment or practices within our business or supply chain, without fear of reprisals.

#### 4. Our approach to assessing and managing risk

We conduct a regular review of our material suppliers and assess whether any particular risks of slavery or human trafficking arise.

We do not consider that our key relationships with professional or business services suppliers gives rise to material risks in this area. The biggest risks which we consider as potentially arising within our businesses are in relation to facilities management, catering, and the supply of office electronic equipment.

We mainly manage the risk through the use of reputable suppliers. Within Citation Ltd we ask suppliers who supply goods or services of more than £50,000 per annum to confirm that their own business activities do not involve slavery or human trafficking.

From August 2019 all other group companies (below £36m turnover) have a Modern Slavery policy based upon best practice and the Group policy. This includes requesting all colleagues and new joiners to complete the Modern Slavery e-learning module annually.

#### 5. Our effectiveness in combating slavery and human trafficking

Within Citation Ltd, we have identified a small number of suppliers in higher risk areas with an annual spend in excess of £50,000. We reach out to those suppliers and conduct due diligence on their compliance with the Modern Slavery Act.

We will continue to monitor and engage with all our material suppliers on the steps they are taking over the next year.

In Citation Ltd we require all new starters to complete our eLearning module to help communicate our commitment to abolishing modern slavery and help the business understand how to address it wherever they come across it. Colleagues are also required to complete refresher training every 12 months. This training extends to all Group companies.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Citation's slavery and human trafficking statement for the financial year ending 31 December 2023.

This statement was approved by Chris Morris on 24<sup>th</sup> May 2024.



**Chris Morris**  
**Group Chief Executive Officer**