

Modern Slavery Statement

Introduction to Spencer Stuart

Spencer Stuart has 65 years' experience in leadership consulting. Over the decades, Spencer Stuart has built a reputation for delivering meaningful impact for our clients — from the world's largest companies to entrepreneurial startups to nonprofit organizations. Spencer Stuart brings together the market and leadership knowledge of more than 450 consultants and rigorous assessment methodologies to help our clients select and develop outstanding leaders, improve the performance of teams, increase employee engagement and align organizational culture with strategy.

Organizational Structure

Spencer Stuart & Associates Ltd is part of Spencer Stuart group, a global executive search and leadership assessment services firm that recently expanded, bringing Spencer Stuart group operating through 70 offices in over 30 countries in accordance with applicable local laws.

Supply Chains

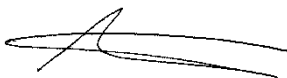
As a professional services firm, we engage a relatively small number of suppliers to provide with services to our office (such as security, cleaning, catering) and products such as laptops and marketing materials. We also engage (on ad hoc basis) other professional and consulting firms that are responsible for their compliance with the Modern Slavery Act 2015.

Our Policy on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our organization and in our supply chain. Spencer Stuart is against all forms of human trafficking and slavery and undertakes all reasonable steps to ensure that the standards in the Modern Slavery Act 2015 and our additional standards are implemented internally and externally. We strive to build long standing relationships with local suppliers worldwide and make clear our expectations of business behaviour and best practices. Our codes of conduct (firm wide and supplier code of conduct) set out that our firm and all suppliers are committed to conducting business in the highest professional and ethical manner. Additionally, we have whistle blower hotlines to encourage the reporting of concerns related to any suspected violations of human rights or non-compliance with the code, policies or applicable laws. Our codes of conduct are regularly reviewed and updated, if applicable, to comply with best practices and is accepted by all employees and suppliers. Moreover, we expect all those in our supply chain and contractors comply with our values and code - <https://www.spencerstuart.com/supplier-code-of-conduct>. Any instances of non-compliance will be immediately remedied.

Additional Steps

Because we provide leadership consulting at the highest level of organizations and because we work for clients that are Fortune 500 companies and we have a limited supply chain, we have assessed that our risk for violations of the Modern Slavery Act are comparatively low. As a result, we have determined that no any additional remedial actions are necessary at this time to combat slavery and human trafficking, but we are committed to taking steps to monitor potential risks in our supply chain. Thus, the Finance director as the individual responsible for the compliance with the Modern Slavery Act. and our compliance team will monitor our compliance annually and consider any additional measures each year. This statement is approved by the board of directors and made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for financial year 2021.



Patrick Hynes
Director of Spencer Stuart & Associates Ltd.