Modern Slavery Statement

Last Revision Date: June, 2017

This slavery and human trafficking statement is made by Kroll pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") for the financial year ending on 30 September 2016. It sets out the steps taken by Kroll to ensure that slavery and human trafficking are not present in our business or direct supply chain.

About Kroll

Kroll is the leading global provider of risk solutions, providing a wide range of investigations, cyber security, due diligence and compliance, physical and operational security, and data and information management services. Headquartered in New York with more than 35 offices in 20 countries, Kroll has a multidisciplinary team of nearly 1,000 employees and serves a global clientele of law firms, financial institutions, corporations, non-profit institutions, government agencies, and individuals.

In providing a range of compliance, due diligence and investigative services to clients for over 40 years, Kroll has developed expertise in identifying and investigating issues in supply chains, helping clients to mitigate not only the risk of modern slavery but other common risks such as corruption, fraud and other white collar crime.

Our supply chain

At Kroll, we consider ourselves to be relatively low risk in relation to modern slavery, given the services we provide and the type of suppliers we use. Our key supply chain comprises our global network of service and information providers, many of whom are highly skilled experts and industry specialists. We periodically review our use of suppliers and, as necessary, adapt our processes if we determine that our risk has changed.

Our approach to combatting modern slavery

Kroll is committed to conducting business in a responsible and ethical manner. We have a zero tolerance approach to modern slavery and expect the same high standards and commitment from those we do business with.

Kroll’s internal policies and procedures aim to ensure that effective systems and controls are in place to prevent slavery and human trafficking from occurring in any part of our business. Kroll’s Code of Conduct and Business Ethics promotes a culture of integrity by establishing principles for how we deal with our clients, employees and the public. Amongst other things, the values and rules set out in the Code encourage us to foster a safe, healthy and productive workplace and to maintain accountability at all levels of the organisation. Employees are encouraged to report any concerns they may have, including in relation to the occurrence of slavery or human trafficking, either to management or through an anonymous ethics helpline.

Suppliers forming a key part of Kroll’s supply chain, for example, those who assist us in our provision of services to clients, undergo a standardized vetting process, with the use of template agreements and a standard questionnaire to gather relevant information. The Kroll Compliance business also runs due diligence reports on all of these suppliers as part of the vetting process. All suppliers must be vetted and approved before they can be used on any engagement. The vetting process is designed as a risk mitigation measure to provide the best service for our clients and to protect and enhance the Kroll brand. Kroll has updated its UK supplier documentation to specifically refer to the Act and now requires each supplier to certify that they comply with the Act or equivalent principles.

Next steps

Going forward, Kroll will continue to review and update policies and procedures with respect to this issue.

Tom Everett-Heath
Regional Managing Director, EMEA
Kroll