



Crest Advisory - Modern Slavery Statement

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Crest Advisory (UK) Ltd is a company registered in England and Wales (08181317)
2 Bath Place, Rivington Street, London, EC2A 3DR
www.crestadvisory.com

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Foreword

At Crest Advisory, our deep experience analysing criminal justice systems has taught us that modern slavery operates in complex, often hidden ways throughout society. Our research and consulting work has revealed how exploitation can persist even within seemingly legitimate business operations, which is why we approach our own anti-slavery commitments with the same analytical rigor we bring to our advisory services. By understanding these systemic challenges, we can better fulfill our responsibility to ensure that neither our operations nor our partnerships enable exploitation in any form.

This Modern Slavery Statement, our first, demonstrates how we're translating our expertise in solving complex policy challenges into practical action within our own organisation. We've carefully examined each aspect of our operations—from recruitment practices to supply chain management—to build a comprehensive framework for preventing exploitation. Our approach combines thorough risk assessment methodologies with practical safeguards, creating multiple layers of protection against modern slavery. Just as we advise our clients to address root causes rather than symptoms, we're implementing systematic changes that target the underlying conditions that can enable exploitation.

Looking ahead, we recognise that meaningful progress requires both institutional commitment and industry-wide collaboration. Drawing from our experience in policy reform, we understand that lasting change comes through sustained, strategic action and careful measurement of outcomes. That's why we've developed specific, measurable goals for enhancing our due diligence processes, expanding our training programs, and strengthening our partnerships. Through transparent reporting and active engagement with our stakeholders, we aim to contribute to the broader movement against modern slavery while continuously improving our own practices. Our commitment extends beyond compliance—it reflects our fundamental belief that everyone deserves to live and work in dignity, free from exploitation in all its forms.

Introduction

At Crest Advisory, we understand the importance of ethical business practices and our responsibility to fight modern slavery. We believe that proactive measures, creating awareness, and implementing strong policies can help prevent exploitation and ensure that our business practices drive integrity and respect for human rights.

To demonstrate our commitment to best practices and transparency, we present our first Modern Slavery Statement per Section 54 of the Modern Slavery Act 2015. This document outlines our steps to prevent modern slavery by identifying and addressing associated risks in our operations and supply chains.

Organisation structure

Crest Advisory—founded in 2011 and headquartered in the United Kingdom—is a purpose-driven organisation that identifies and helps solve complex policy problems arising from crime, vulnerability, and other social harms. We work with stakeholders including agencies and organisations involved in justice, policing, and public safety. Our projects are primarily within the United Kingdom, with only a few internationally funded projects. As of January 2025, Crest had 47 employees, with most of our workforce hired locally.

At Crest, the executive directors and the chair oversee decision-making. The Director of Operations is responsible for Crest policies, including supplier management and the risk register. However, accountability for specific aspects of Crest policies also extends to other team members. The Director of Operations also escalates issues to the executive directors as needed.

Supply chains

Our supply chain encompasses a broad spectrum of services provided by third-party suppliers, most being long-term and based in the United Kingdom. These services can be categorised into the following key areas:

1. **Technology sourcing** includes the necessary services, such as hardware, telecommunications, and other technology infrastructure, that enable our business operations.
2. **Workplace** services cover all physical office needs, including leasing the physical office space, furniture, and essential office supplies.
3. **Travel, meetings, and events** cover elements that allow our team members to move for project-related activities (e.g., transportation, accommodation), supplies for client engagements (e.g. catering), and staff training.

Given the nature of our consultancy business, tracking our supply chain presents specific challenges; however, we have gathered information about our Tier 1 suppliers through our risk

assessment. In the medium term, as our supply chain evolves and our business expands, Crest is committed to mapping additional tiers of our supply chain.

Due diligence

Due diligence in recruitment and hiring

During our recruitment process, Crest will make any reasonable adjustments to meet the needs of the candidates. Our standard screening questions - aligned with the equal opportunities monitoring form - concern demographics, mental or physical health, education, socio-economic indicators and criminal background. However, this information does not impact the recruitment process. We ensure all candidates have valid work authorisation during the interview to protect individuals from potential exploitation and uphold fair labour practices.

As part of our business model, we engage closely with independent contractors, known as Associates, who bring diverse expertise to support the Crest team across various issues. These consultants are crucial in enhancing our operations by providing specialised consultancy services. We review each associate's history related to past offences, including child labour or exploitation, adherence to environmental legislation, and health and safety policies before they join Crest.

Upon review, we identified an opportunity to expand our due diligence framework regarding hiring and recruitment. In the medium term, we aim to enhance our Associate onboarding process by incorporating questions related to modern slavery compliance. This includes inquiries about any investigations or convictions related to modern slavery within their organisation.

Additionally, we will expand our onboarding process for new staff to assess their understanding of their rights and protections concerning modern slavery. This approach will empower employees to recognise and report potential instances of exploitation and foster a culture of awareness and ethical responsibility within Crest.

Due diligence on business partners

We recognise the importance of conducting thorough due diligence on our business partners, particularly businesses in similar sectors. Collaborating with like-minded organisations enhances our service delivery, but it also requires rigorous vetting to ensure shared values and ethical standards. In the upcoming year, we will ensure that our due diligence process on business partners involves evaluating the business partner's expertise, reputation, and track record, as well as their adherence to legal and regulatory frameworks, including those related to modern slavery.

Due diligence on suppliers

Our Supplier Management Policy outlines Crest's due diligence and risk assessment processes before engaging third-party services. The policy includes drafting a legal agreement, conducting risk assessments, and ensuring the service provider has a good business reputation, appropriate

abilities, expertise, capacity, and resources (e.g., human, IT, financial). It also includes the suppliers' actions to minimise the risk of modern slavery. Our initial review has identified an opportunity to strengthen our supplier monitoring process and introduce additional mitigation measures related to modern slavery.

Risk Assessment

Risk assessment of suppliers

At Crest, risk assessments—also known as risk classification—are an essential process used to evaluate and manage the potential risks our suppliers pose based on the services they provide to the business. Certain suppliers carry a higher risk profile depending on the nature of their services and the sensitivity of the data they handle.

In line with our Supplier Management Policy, the Business Support Team assesses each supplier's risk profile and documents it in the 'Vendor Register.' This risk register is regularly reviewed during Management Review meetings to ensure continuous appraisal and mitigation of potential risks.

When determining a supplier's risk profile, we take into account the following factors:

1. **Services provided:** The type and nature of the offered service(s)
2. **Data sensitivity and volume:** The types of data handled by the vendor and the volume of sensitive or confidential information they will access
3. **Country risk:** The supplier's physical location
4. **Industry compliance factors:** Regulatory and compliance requirements related to the supplier's industry
5. **Operational criticality:** The importance of the services to Crest's day-to-day operations
6. **Duration of use:** How long will Crest use the service (e.g. short-term or long-term)
7. **Vendor exclusivity:** If the supplier is the sole provider of the service
8. **Data breach impact:** The potential impact on Crest if the supplier were to experience a data breach
9. **Network access requirements:** If the supplier requires access to Crest's internal network or systems

After completing an internal review of our risk assessment, we discovered that while our assessment covers a wide range of risks, we have not yet evaluated our exposure to modern slavery. In the future, we plan to enhance our risk profile by including sector-specific risks to better understand the prevalence of modern slavery within the industries in which our suppliers operate.

Training

Our Diversity and Inclusion team recognised Anti-Slavery Day on 18 October 2024 by sending a staff-wide communication. It included links to additional resources on modern slavery, and a

summary of the training conducted the day before on the relationship between Crest's work and modern slavery.

However, our first internal review highlighted a gap in modern slavery training for our Business Support team and general staff. Moving forward, we aim to strengthen our efforts by providing comprehensive training to ensure all employees are well-equipped to address modern slavery risks.

Policies

At Crest, our top priorities are the safety, security, and well-being of our employees, partners, and beneficiaries. Our **Employee Handbook** outlines our commitment to equal opportunities and sets clear expectations for each employee's responsibilities. Moreover, our disciplinary policy ensures consistency and fairness across the organisation to maintain high standards of conduct and performance.

We are equally dedicated to fostering an open and supportive environment for our employees. Our comprehensive grievance procedures and whistleblowing policy encourage staff to raise concerns without fear of repercussion. We assure all employees that those who come forward will not face any negative impact on their promotion prospects, access to training, or other aspects of their employment.


Our safeguarding policy highlights our commitment to minimising harm in every aspect of our work. This policy applies to our staff and partners and ensures that we maintain the highest standards of safety and well-being across all of our operations.

In line with our commitment to ethical practices and social responsibility, we are developing a comprehensive modern slavery policy integrated with our existing policies.

Key performance indicators (Goals)

At Crest, we are forward-thinking in our approach to modern slavery by incorporating relevant considerations into our policies. We believe establishing a dedicated modern slavery policy and adhering to best practices is vital for fostering an ethical workplace. Our commitment includes ensuring that suppliers with a turnover above £36 million in the past year submit modern slavery statements, develop a supplier code of conduct, and expand employee training. These initiatives reflect our proactive stance on minimising risks and promoting ethical standards across our organisation.

We will report on the outcomes of these efforts in our annual Modern Slavery Statement. The status of each action will be categorised as: *Not started* (dark blue), *in progress* (orange), and *completed* (green).

Commitment	Status	Updates
Develop and implement a dedicated modern slavery policy, integrating it with our existing governance frameworks.		
Ensure suppliers with a turnover above £36 million in the past year have submitted a modern slavery statement and regularly review their compliance.		
Evaluate the potential development of an online assessment tool based on the Responsible Recruitment toolkit to promote ethical hiring practices.		
Update our policies to adhere to the Employer Pays Principle , ensuring no worker bears recruitment costs.		
Develop and implement a supplier code of conduct outlining expectations regarding ethical standards and modern slavery prevention.		
Enhance and expand our modern slavery training program for		

our general staff and business support team.		
Revamp our intranet's modern slavery section to ensure all anti-modern slavery tools, resources, and information are easily accessible to staff.	