

Modern Slavery Act Transparency Statement

This statement is made on behalf of the North Highland group of companies, including North Highland UK Limited (hereinafter referred to as "North Highland"). We are publishing this statement in accordance with the Modern Slavery Act 2015 and as a demonstration of our commitment to anti-slavery practices and as an affirmation of the values we hold across our business.

North Highland is committed to ensuring that the way we conduct our business and dealings with our suppliers reflects our values and respect for human rights. Integrity and Care are core values of our Firm, which means we respect and value the individual contributions and quality of life for everyone. We are committed to working with suppliers that share these values and uphold the principles in this statement.

Our firm

North Highland is a leading change and transformation consultancy. We make change happen, helping businesses transform, with people at the heart of every decision. We deliver a truly people-first experience. One that is powerful, unique, trusted, and collaborative. It's more than just a methodology – it's a way of working that creates real value.

We are a part of the North Highland group of companies, and our ultimate parent company is TNHC Consulting, Inc., which has its head office in Atlanta, Georgia USA. The Group has over 1,100 employees and operates principally in the USA and UK, but we provide worldwide support for our clients through our global alliance.

We are dedicated to maintaining a fair and ethical workplace for all our staff and to ensure compliance with all applicable employment legislation. Given the nature of the services we provide and the professional workforce we employ, however, we assess the risk of modern slavery or human trafficking in our own organization to be low.

Our supply chain

As a provider of professional services, North Highland does not have a substantial supply chain. North Highland's supplier relationships are primarily limited to: smaller specialist consulting companies; suppliers of IT services and equipment and other office supplies (including consumables such as paper, pens and other writing materials); utilities suppliers; and travel and transportation services (public and private).

We have reviewed our supply chain and believe the overall risk of modern slavery is low based upon: the nature of the goods and services we procure; the locations from which we procure them; and our procurement practices. Nonetheless, we remain vigilant and monitor the level of risk involved throughout any of our suppliers and are prepared to take appropriate measures as a higher risk of modern slavery may be identified. We are committed to partnerships with suppliers that share our dedication to conducting business in a legal, ethical, and socially responsible manner.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have zero tolerance to slavery and human trafficking. Our internal policies reflect our commitment to acting ethically and with integrity in all our business relationships. And we expect all our contractors, suppliers and other business partners to uphold the same high standards as we do, by ensuring all employees and workers are treated with dignity and respect in a fair and ethical environment.

Employment practices

Our employment policies comply with relevant labour laws. In addition, we provide equal opportunities in employment and employees are treated fairly and without discrimination on the basis of any protected characteristics. Further, we expect that all suppliers will abide by applicable labour laws, operate in a manner consistent with the principles of human rights and will not use forced labour or child labour in any form. Minimally, suppliers are expected to comply with any applicable international and local legal requirements in their countries of operation.

Due diligence

We work to identify, assess, and monitor any potential areas of risk in relation to our business and supply chains. This includes considering the length of the relationship, nature of what is being supplied and the location from where it is being supplied. We will continue to look to manage any risks identified.

Looking ahead

While we do not operate in any high-risk contexts, we seek to ensure a very high level of effectiveness in ensuring that slavery and human trafficking are not taking place in any part of our business or supply chain. We will continue to monitor and develop our practices in respect of combatting slavery or human trafficking to target areas of our business if we become aware there is a potential risk of modern slavery. Our legal function is responsible for checking and testing the success of our commitments, and will work to ensure we meet our expectations.

This statement is made on behalf of North Highland pursuant to Section 54(1) of the Modern Slavery Act 2015 for the financial year ended 31 December 2021. It was approved by North Highland UK Limited as of 31 January 2022.



Patrick R. Ray
Secretary and General Counsel