

Document ownership:

Chief Risk and Compliance
Officer

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1. Policy statement

Sumer is committed to maintaining the highest ethical standards, and to upholding human rights.

While not all Hubs are individually captured by the statutory requirements, we have adopted a consistent approach across the group to ensure that modern slavery risks are understood, managed, and addressed in a proportionate and coordinated way.

2. Who must comply with this policy?

Everyone at Sumer. It applies to all employees whether full-time, part-time, or temporary, It also applies to any third parties we do business with and any consultants or intermediaries acting on our behalf.

Sumer publishes an annual Modern Slavery Statement which sets out our approach to preventing modern slavery and details the steps we are taking to reduce modern slavery risks within our business and our supply chain. In line with regulatory requirements, this is published on the Sumer Group website.

3. Modern slavery

Modern slavery is a serious crime where people are exploited, controlled, and forced to work, often for little or no pay. It includes slavery, forced labour, servitude, and human trafficking. Victims are often trapped with no real freedom or choice. Those behind it are often associated with other crimes such as benefit fraud, tax evasion, and money laundering—harming both individuals and the wider economy.

Sumer can be exposed to modern slavery through our supply chains and client work. Our role in audit, tax, and advisory gives us insights into our client's businesses which may give us the opportunity to spot red flags, such as unusual labour costs, questionable supplier arrangements, or financial irregularities. Staying alert allows us to help identify and prevent exploitation.

Sumer prohibits all forms of modern slavery within our own business, and we expect the same standards from our suppliers, contractors, and clients we advise.

We do not tolerate:

- Child labour in any part of our operations.
- Forced or compulsory labour, including any situation where individuals cannot leave work freely with reasonable notice.
- Withholding of personal identification documents (such as passports or visas) unless voluntarily provided for safekeeping and returned on request.
- Debt bondage, including employment terms that trap individuals through unreasonable repayment obligations, inflated accommodation costs, or recruitment fees.

3.1 Spotting the signs of modern slavery

We may come across indicators of modern slavery through client engagements, especially during financial reviews, compliance work, or advisory services. Whilst we may not see direct exploitation, there are financial or behavioural red flags that may suggest modern slavery is present.

Potential red flags include:

- Unusual payroll activity, such as payments to a small number of bank accounts for a large workforce
- Cash-heavy businesses with poor financial records or unexplained revenue patterns
- Discrepancies between headcount and output, e.g. low declared staff numbers in labour-intensive industries
- Lack of employment contracts or overly complex subcontracting arrangements that obscure who is responsible for workers
- Suppliers based in high-risk countries or sectors (e.g. cleaning, agriculture, construction) with limited evidence of due diligence having been carried out.
- Clients unwilling to share information on labour practices or avoiding related enquiries about their business
- Signs of control over workers, such as group transportation, shared housing linked to the employer, or uniform documentation (e.g. identical visa expiry dates)

3.2 If you suspect modern slavery

If you come across anything suspicious, you must escalate the concern. Do not try to investigate or resolve it yourself.

Do:

- Escalate your concerns through your Line Manager, Managing Partner, Compliance team, Group Risk, Legal and Compliance team or Sumer's Speak Up channel if needed (search "Speak up" in Sumer Connect). We will then consider whether a Suspicious Activity Report (SAR) or other external reporting obligations are required.

Don't:

- Confront the client or suspected perpetrator – this may tip them off and jeopardise any investigation
- Approach the potential victim – this could put them at greater risk or cause distress
- Ignore the signs – even if uncertain, report your concern so it can be properly assessed

3.3 We assess our modern slavery risk

Sumer identifies, assesses, and reduces modern slavery in our operations by ensuring we uphold our ethical and legal responsibilities. We do this by implementing a modern slavery policy, and procedures, such as but not limited to:

- Induction training for all new employees including awareness of modern slavery and provide refresher training as necessary
- A risk assessment (facilitated by Sumer) will aim to understand where the risk of exploitation may exist – either within our own business or through the goods and services we buy
- We screen our supplier base assessed to be higher risk from a modern slavery perspective against adverse media sources to identify potential reputational, financial, or regulatory risks
- We implement a whistleblowing policy, and contractual controls
- Where modern slavery risk is higher (e.g. due to the industry such as cleaning or client risk exposure), Hubs must monitor these risks more frequently as part of their AML procedures

4. Responsibilities

Everyone – we are all responsible for the prevention, detection and reporting of modern slavery in any part of our business or supply chain. We must comply with this policy, associated standards and guidelines, and any communications related to it.

Chief Executive – has responsibility and ownership for this, and all, global policies. Performance will be reported regularly to the Sumer Board.

Entity Leaders – including Partners, Managing Directors or other functional leads – are responsible for ensuring that business areas under their control implement and maintain arrangements to comply with this policy.

5. How to raise a concern

Any Sumer Group employee, business partner, or other stakeholder can raise a concern if they believe that this policy is being, or at risk of being, breached. You should raise any concerns as soon as practically possible – either through your line manager, your local HR representative, your local managing partner or the Sumer Group Risk and Compliance team.

Alternatively, concerns can be raised confidentially and anonymously via the Sumer [Speak Up channel](#).

6. Breaches of this policy

Breaches will be managed in line with the applicable Hub disciplinary policy. All breaches must be reported to the Sumer Group Risk and Compliance Team using the Compliance Breach Register via the compliance portal.

7. Further guidance

This policy should be read in conjunction with other relevant policies, including but not limited to Anti-Money Laundering, Anti-Bribery, Anti-Facilitation of Tax Evasion and Speak Up. All policies can be accessed via Sumer Connect.