Alpha FMC Modern Slavery and Human Trafficking Statement, FY2021

Modern slavery and human trafficking represents an international problem that transcends age, gender and race. The Modern Slavery Act makes significant steps towards preventing modern slavery in organisations and their supply chains. This statement describes the procedures and policies Alpha Financial Markets Consulting (Alpha FMC) has in place throughout our business, supply and procurement chains to combat slavery, human trafficking and exploitation.

Summary of Changes:
- Established Corporate Sustainability team responsible for ensuring our business practices are sustainable over the long-term and consider the needs of all of our stakeholder groups.
- Introduced global training on Anti Facilitation of Tax Evasion to ensure employees know how to recognise and avoid tax evasion.
- Created Alpha Connected to support employees during remote working and the pandemic.

Alpha FMC is a leading provider of management consultancy services to the asset and wealth management industry with over 400 employees in 12 financial centres globally.

Alpha does not operate in an industry where slavery is prevalent, nonetheless we are dedicated to conducting business at the highest standard and expect all employees to make decisions based on the business’s core values of integrity, accountability and responsibility.

To this effect and to fulfil our obligations under the Modern Slavery Act, Alpha has developed dedicated processes for the identification and prevention of human rights abuses.

Assessing Risk in Supply Chains:

We govern all third-party relationships with slavery and human rights issues in mind, ensuring that suppliers pay their employees above the National Minimum Wage. We continue taking steps to develop a process to review and assess how all our indirect suppliers comply with the Modern Slavery Act. We have a specific focus on the recruitment agencies used by Alpha FMC to hire permanent and temporary staff to ensure their terms and conditions include a specific requirement to comply with the modern slavery legislation.

From an operational perspective, our teams have been notified that Alpha FMC’s new supplier contracts also have to be agreed in line with the Modern Slavery Policy, meaning that any new contracts will be reviewed with this in mind. In addition, Alpha has a dedicated Corporate Sustainability team responsible for ensuring our business practices are sustainable over the long-term and consider the needs of all of our stakeholder groups, both internal and external. We have recently developed a reporting framework across 4 key pillars: Professional Integrity, Data Security, Workforce Diversity & Engagement and the Environment. We will be actively monitoring our progress against industry best practice and reporting on a periodic basis to our investors, employees and the public.

Ensuring Fair Compensation and Appropriate Recruitment Procedures:

In accordance with the Asylum and Immigration Act (1996) and the Immigration (Restrictions on Employment) Order (1996) we require all employees to produce evidence that they have current and valid permission to work in the UK. All direct employees are offered competitive salaries based on industry specific benchmarks and have access to profit share and benefit schemes. There is an annual review of all employee packages to ensure it is a fair reflection of that employee’s contribution to the firm. In addition, we have ensured that all interviewers attend mandatory training before conducting any interviews to make sure they are conducted appropriately.

Living Wage:

Alpha FMC became an accredited Living Wage employer as of 29th January 2018. The Living Wage is calculated according to real living costs and represents Alpha’s continued commitment to remunerating its employees and support staff fairly.

Employee Training and Awareness:

Alpha FMC have highlighted the Modern Slavery policy to all employees to educate them on how to spot all forms of slavery by including the policy in the
Employee Handbook. Alpha FMC’s CSR team works with HR and has the shared responsibility to answer any questions that employees may have around modern slavery.

Alpha FMC updated the Employee Handbook to ensure employees know where they can get further information on modern slavery and how to identify it. Globally, employees are offered bystander training with respect to gender equality. This training provides an action toolkit and identifies the necessary support channels if an employee is witness to any incidents that may need intervention or reporting, and the plan is to expand it to cover other areas as well. Furthermore, Alpha FMC hosted mandatory training on Anti Facilitation of Tax Evasion to ensure employees know how to recognise and avoid tax evasion.

Development of Alpha FMC’s Business:

This year Alpha FMC launched an ESG (Environmental, Social, Governance) & Responsible Investing Practice. The development of the ESG practice enables Alpha FMC to support our clients in integrating ESG Factors into their existing investment processes and develop their commercialisation strategy.

Wellbeing While Working Remotely

The previous year has been challenging for many due to Covid-19 and the impacts on both work and personal lives. Alpha FMC has established Alpha Connected to ensure employees receive the right support during these challenging times and are aware of the tools and processes in place for reporting any concerns.

Diversity and Inclusion (D&I):

Alpha FMC is dedicated to creating a workspace that presents equal opportunities for all employees through our six core D&I pillars of Gender Equality, Wellbeing in Alpha, Pride in Alpha, Ethnic & Cultural Diversity, Social Mobility and Disability Confidence.

How to Report Suspicions of Slavery:

Alpha FMC remains committed to protecting whistle blowers and encourages employees, who suspect wrong doing of any nature, including that of human rights abuse and slavery, to report this information via the processes outlined in the employee handbook. Alpha FMC measures this area by recording the number of concerns raised and investigated in line with Modern Slavery Policy. There were no cases reported this year. We have also developed an anonymous reporting functionality that allows employees to raise any concerns they may have regarding Modern Slavery and Human Trafficking.

Alpha FMC will review and update this statement annually in line with section 54(1) of the Modern Slavery Act 2015 and as part of Alpha’s dedication to its corporate social responsibility strategy, as well as its Living Wage employer commitment.

This statement has been made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Alpha Financial Markets Consulting’s slavery and human trafficking statement for the financial year ending 2021.

Approved by the Board on 4 February 2021 and signed on its behalf by:

Euan Fraser, Global Chief Executive Officer

Next Steps

- Expand Bystander Training from a focus on Gender Equality to coverage of other areas at Alpha FMC as well
- Continue to work with Business Operations teams to ensure that any new third-party contracts are agreed in line with the Modern Slavery Policy

If you have questions or would like further information about modern slavery, please contact enquiries@alphafmc.com. If any employees have concerns about modern slavery or human trafficking issues please use the Whistleblowing Policy as outlined in the Employee Handbook or raise them using Anonbot.
Modern Slavery and Human Trafficking Statement, 2020

Modern Slavery thrives in stable economies as a result of human trafficking driven by geopolitical unrest and inequality, these are in turn exacerbated by factors such as climate change. Alpha FMC is committed to addressing this prevalent issue by ensuring it is not present in its business and supply chains.

The Modern Slavery Act makes significant steps towards preventing modern slavery in organisations and their supply chains. This statement describes the procedures and policies Alpha Financial Markets Consulting (Alpha FMC) has in place throughout the UK business, supply and procurement chains to combat slavery, human trafficking and exploitation, with every effort being made to apply policies to the global business.

Alpha FMC is a leading provider of management consultancy services to the asset and wealth management industry with over 400 employees operating from offices spanning the UK, Europe, North America and Asia.

Alpha FMC does not operate in an industry where slavery is prevalent, nonetheless we are dedicated to conducting business at the highest standard and expect all employees to make decisions based on the business’s core values of integrity, accountability and responsibility.

To this effect and to fulfil our obligations under the Modern Slavery Act, Alpha FMC has developed dedicated processes for the identification and prevention of human rights abuses.

**Recruitment:**

In accordance with the Asylum and Immigration Act (1996) and the Immigration (Restrictions on Employment) Order (1996) we require all employees to produce evidence that they have current and valid permission to work in the UK. All direct employees are offered competitive salaries based on industry specific benchmarks and have access to profit share and benefit schemes. There is an annual review of all employee packages to ensure they are a fair reflection of that employee’s contribution to the firm.

Our recruitment process is also subject to scrutiny and we ensure that all interviewers attend mandatory training before engaging with candidates.

**Assessing Risk in Supply Chains:**

As providers of consulting and other professional services, Alpha works with a range of suppliers who provide products and services to support our business ranging from office consumable to technology. While we work closely with our suppliers and have many long-term supplier relationships, we do not consider that we are dependent upon any supplier.

We govern all third-party relationships with slavery and human rights issues in mind, ensuring that suppliers pay their employees above the National Minimum Wage. We have a specific focus on the recruitment agencies used by Alpha FMC to hire permanent and temporary staff to ensure their terms and conditions include a specific requirement to comply with modern slavery legislation.

We are continually developing the review process and assess how all our indirect suppliers comply with the Modern Slavery Act. We are embedding further risk assessment steps for modern slavery in our due diligence process and attributing accountability to those who manage each supplier. Our goal is to check all supplier candidates against global sanctions databases* as well as the media, to identify human trafficking, human rights abuse or labour violations. Our Operations teams are informed that Alpha FMC’s new supplier contracts also must be agreed in line with the Modern Slavery Policy.

Whilst we ensure we act in compliance with the Modern Slavery Act, Alpha FMC actively supports causes that combat the issue, for example working with suppliers who guarantee a minimum wage to the vulnerable.

*(World Bank Debarment List, OFAC)

**Development of Alpha FMC’s Business:**

Alpha FMC strives to apply anti-slavery policy across the business and generate positive externalities where possible. Furthermore, we have developed an ESG (Environmental, Social, Governance) & Responsible Investing proposition, which enables us to support our clients in integrating ESG Factors into their existing investment processes and develop their commercialisation strategy.
Employee Training:

Alpha FMC has included the policy in the employee onboarding process to improve identification of modern slavery supported by a dedicated CSR role responsible for addressing any further questions employees may have. Globally, employees were also offered the opportunity to attend Bystander training which provided an action toolkit and identified the necessary support channels if an employee is witness to any incidents that may need intervention or reporting.

Reporting Slavery Suspicions:

Alpha FMC remains committed to protecting whistle blowers and encourages employees, who suspect wrongdoing of any nature, including that of human rights abuse and slavery, to report this information via the processes outlined in the employee handbook. Our reporting functionality enables employees to raise concerns they may have regarding Modern Slavery and Human Trafficking anonymously. Alpha FMC record the number of concerns raised and investigated in line with the Modern Slavery Policy with zero cases reported this year.

Living Wage:

Alpha FMC was accredited a Living Wage employer again in 2019 and is in the process of a 2020 accreditation. The Living Wage is calculated according to real living costs and represents Alpha’s continued commitment to remunerating employees and support staff fairly.

Diversity & Inclusion and CSR:

Alpha FMC is dedicated to creating a workspace that presents equal opportunities for all employees through our six core D&I pillars of Gender Equality, Wellbeing in Alpha, Disability Confidence, Pride in Alpha, Culture & Ethnic Diversity and Social mobility in Alpha.

Alpha FMC drives wider corporate responsibility initiatives which set out social and environmental development in the workplace. Alpha FMC has recently engaged in a partnership with Plastic Oceans who are a non-profit organisation that addresses the issues of plastic pollution and how it impacts our waters, sea life and humans, a root problem in climate change driving displacement and modern slavery.

We actively work to enable those from disadvantaged backgrounds to enter the banking and finance sector. For example, in December workshops were held to enable school children to gain exposure to the industry via Sutton trust events. Our aim for 2020 is to assess each recruitment supplier to ensure they are aligned with our internal D&I initiatives.

Alpha FMC will review and update this statement annually in line with; section 54(1) of the Modern Slavery Act 2015, our corporate social responsibility strategy and our Living Wage employer commitment.

This statement has been made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Alpha Financial Markets Consulting’s slavery and human trafficking statement for the financial year ending 2020.

Approved by the Board on 16th April 2020 and signed on its behalf by:

Euan Fraser, Global CEO
Modern Slavery and Human Trafficking Statement, 2019

Modern Slavery and human trafficking represents an international problem that transcends age, gender and race. The Modern Slavery Act makes significant steps towards preventing modern slavery in organisations and their supply chains. This statement describes the procedures and policies Alpha Financial Markets Consulting (Alpha FMC) has in place throughout our business, supply and procurement chains to combat slavery, human trafficking and exploitation.

Alpha FMC is a leading provider of management consultancy services to the asset and wealth management industry with over 360 employees in 12 financial centres globally.

Alpha does not operate in an industry where slavery is prevalent, nonetheless we are dedicated to conducting business at the highest standard and expect all employees to make decisions based on the business’s core values of integrity, accountability and responsibility.

To this effect and to fulfil our obligations under the Modern Slavery Act, Alpha has developed dedicated processes for the identification and prevention of human rights abuses.

Recruitment:

In accordance with the Asylum and Immigration Act (1996) and the Immigration (Restrictions on Employment) Order (1996) we require all employees to produce evidence that they have current and valid permission to work in the UK. All direct employees are offered competitive salaries based on industry specific benchmarks and have access to profit share and benefit schemes. There is an annual review of all employee packages to ensure it is a fair reflection of that employee’s contribution to the firm. In addition, we have ensured that all interviewers attend mandatory training before conducting any interviews to ensure they are conducted appropriately.

Assessing Risk in Supply Chains:

We govern all third-party relationships with slavery and human rights issues in mind, ensuring that suppliers pay their employees above the National Minimum Wage. We continue taking steps to develop a process to review and assess how all our indirect suppliers comply with the Modern Slavery Act. We have a specific focus on the recruitment agencies used by Alpha FMC to hire permanent and temporary staff to ensure their terms and conditions include a specific requirement to comply with the modern slavery legislation. In the year ahead, our Operations teams have been notified that Alpha FMC’s new supplier contracts also have to be agreed in line with the Modern Slavery Policy. In addition to this, Alpha FMC reviewed its business against the United Nations Sustainable Development Goals and we will utilise the report to review actions for the next Financial Year.

Development of Alpha FMC’s Business:

Alpha FMC has recently launched an ESG (Environmental, Social, Governance) & Responsible Investing Proposition. The development of the ESG proposition enables Alpha FMC to support our clients in integrating ESG Factors into their existing investment processes and develop their commercialisation strategy.

Employee Training:

Alpha FMC have highlighted the modern slavery policy to all employees to educate them on how to spot all forms of slavery by including the Modern Slavery policy in the Employee Handbook. Alpha FMC has a dedicated CSR role that works HR with the responsibilities of; answering any further questions that employees may have around modern slavery. Alpha FMC updated the Employee Handbook to ensure employees know where they can get further information on modern slavery and how to identify it. Globally, employees were also offered the opportunity to attend bystander training which provided an action toolkit and identified the necessary support channels if an employee is witness to any incidents that may need intervention or reporting. As part of our commitment to tackling Modern Slavery and Human Trafficking, we are looking to make this a mandatory training session.

Reporting Slavery Suspicions:

Alpha FMC remains committed to protecting whistle blowers and encourages employees, who suspect wrong doing of any nature, including that of human rights abuse and slavery, to report this information via the processes outlined in the employee handbook. Previously Alpha FMC planned to measure this area by recording the number of concerns raised and investigated in line with Modern Slavery Policy. There were no cases reported this year.

We have also developed an anonymous reporting functionality that allows employees to raise any concerns they may have regarding Modern Slavery and Human Trafficking.
Living Wage:

Alpha FMC became an accredited Living Wage employer as of 29th January 2018. The Living Wage is calculated according to real living costs and represents Alpha’s continued commitment to remunerating its employees and support staff fairly.

Diversity and Inclusion (D&I):

Alpha FMC is dedicated to creating a workspace that presents equal opportunities for all employees through our four core D&I pillars of Gender Equality, Wellbeing in Alpha, Pride in Alpha and Cultural & Social mobility in Alpha. This year we also launched our fifth D&I stream: Disability Confidence.

Alpha FMC will review and update this statement annually in line with section 54(1) of the Modern Slavery Act 2015 and as part of Alpha’s dedication to its corporate social responsibility strategy, as well as its Living Wage employer commitment.

This statement has been made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Alpha Financial Markets Consulting’s slavery and human trafficking statement for the financial year ending 31 March 2020.

Approved by the Board on 4 September 2019 and signed on its behalf by:

Euan Fraser, Global CEO
Modern Slavery Act Transparency Statement, 2018

Modern Slavery and human trafficking represents an international problem that transcends age, gender and race. The Modern Slavery Act makes significant steps towards preventing modern slavery in organisations and their supply chains. This statement describes the procedures and policies Alpha Financial Markets Consulting (Alpha FMC) has in place throughout our business, supply and procurement chains to combat slavery, human trafficking and exploitation.

Alpha FMC is a leading provider of management consultancy services to the asset and wealth management industry with over 300 employees and 9 offices globally.

Alpha does not operate in an industry where slavery is prevalent, nonetheless we are dedicated to conducting business at the highest standard and expect all employees to make decisions based on the business’s core values of integrity, accountability and responsibility.

To this effect and to fulfil our obligations under the Modern Slavery Act, Alpha has developed dedicated processes for the identification and prevention of human rights abuses.

Recruitment:

In accordance with the Asylum and Immigration Act (1996) and the Immigration (Restrictions on Employment) Order (1996) we require all employees to produce evidence that they have current and valid permission to work in the UK. All direct employees are offered competitive salaries based on industry specific benchmarks and have access to profit share and benefit schemes.

Assessing Risk in Supply Chains:

We govern all third-party relationships with slavery and human rights issues in mind, ensuring that all suppliers pay their employees above the National Minimum Wage. We are also taking steps to develop a process to review and assess how all our indirect suppliers comply with the Modern Slavery Act. Further to this, Alpha is looking in to amending its terms and conditions and contracting agreements to include a specific requirement to comply with modern slavery legislation. Going forward, Alpha FMC intends to record the number of new supplier contracts, that are reviewed in line with the Modern Slavery Policy.

Employee Training:

Alpha FMC have highlighted the modern slavery policy to all employees to educate them on how to spot all forms of slavery. In addition to this, a dedicated CSR role that works with HR has been created with the responsibilities of answering any further questions that employees may have around modern slavery. Alpha FMC is also looking to update all relevant training modules, to include the contact details of the CSR and HR contact points, as well as information on where employees can get further information on modern slavery and how to identify it.

Reporting Slavery Suspicions:

Alpha FMC is committed to protecting whistle blowers and encourages employees, who suspect wrong doing of any nature, including that of human rights abuse and slavery, to report this information via the processes outlined in the employee handbook. Alpha FMC plans to measure our continuing success in this area by recording the number of concerns raised and investigated in line with Modern Slavery Policy.

Living Wage:

Alpha FMC became an accredited Living Wage employer as of 29th January 2018. The Living Wage is calculated according to real living costs and represents Alpha’s commitment to remunerating its employees and support staff fairly.

Diversity and Inclusion (D&I):

Alpha FMC is dedicated to creating a workspace that presents equal opportunities for all employees through our four core D&I pillars of Gender Equality, Wellbeing in Alpha, Pride in Alpha and Cultural Diversity in Alpha.

Alpha FMC will review and update this statement annually in line with section 54(1) of the Modern Slavery Act 2015 and as part of Alpha’s dedication to its corporate social responsibility strategy, as well as its Living Wage employer commitment.

This statement has been made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Alpha Financial Markets Consulting’s slavery and human trafficking statement for the financial year ending 2018.

Approved by the Board on 30 August 2018 and signed on its behalf by:

Euan Fraser, Global CEO