



Modern Slavery and Human Trafficking Policy Statement 2016

Our commitment to tackling modern slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Momenta is a supplier of flexible, scalable, specialist, contingent resource primarily serving the financial services industry. Our supply chain requirements are predominantly related to the deployment of people to our clients. We recognise this supply chain as the potential area of greatest risk in terms of exposure to modern slavery.

Momenta has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We have implemented and will continue to enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our position with suppliers

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Our contractors are engaged as suppliers through a contract for services. Where that engagement is through an 'umbrella' company, a thorough process of due diligence is completed to ensure adherence to a range of standards including the company's policy and practices in relation to The Modern Slavery Act.

Responsibility for the policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it, however, management at all levels are also responsible for ensuring those reporting to them understand and comply with this policy.

Training on our policy and on the risk our business faces from modern slavery encroaching into our supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Momenta encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form, is or may be taking place in any part of our own business or in any of our supply chains.