



Anti-Slavery and Human Trafficking Policy

As a firm we are committed to acting ethically and with integrity and doing what we reasonably can to ensure that modern slavery and human trafficking are not occurring in our business or our supply chains. This policy, which should be read alongside our Modern Slavery Statement on our website, is designed to explain the steps we are already taking and to set out the responsibilities of everyone who works for the firm to help in this endeavor.

1 What is slavery?

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services imposed by the use of coercion
Forced or compulsory labor	Work or services are exacted from a person under the menace of a penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

1.2 Modern slavery is a complex and multi-faceted crime. At a basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense. The MSA 2015 recognizes the important part businesses can and should play in tackling slavery and encourages them to do so.

1.3 With this in mind, we need to pay particular attention to:

- 1.3.1 our supply chain
- 1.3.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards

2 Responsibilities

2.1 Everyone must observe this policy and be aware that turning a blind eye is unacceptable and not an option.

2.2 The firm

2.2.1 We will employ reasonable measures to:

- (a) maintain policies and procedures aimed at preventing exploitation and human trafficking, and protecting our workforce and reputation
- (b) do what we can to reduce the potential for slavery and human trafficking when it comes to recruitment (see Recruitment)
- (c) check and monitor our supply chains (see Supply chains)

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- (d) have in place an open and transparent grievance process for all staff
- (e) seek to raise awareness so that our colleagues know what we are doing to promote appropriate welfare practices and how to report concerns about slavery and human trafficking
- (f) make a clear statement of the steps we are taking to combat the risk of slavery and modern slavery (see Anti-slavery statement)

2.3 Managers

2.3.1 Managers will employ reasonable measures to:

- (a) remain alert to indicators of slavery (see Identifying slavery)
- (b) raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- (c) treat any concerns raised by colleagues about slavery and human trafficking either within the firm or in our supply chains with the utmost seriousness and act on them

2.4 Colleagues

2.4.1 We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- (a) Read and comply with this policy.
- (b) keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- (c) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- (d) tell us if you think there is more we can do to prevent people from being exploited

Our policy encourages openness and no one will suffer detrimental treatment for reporting a genuine concern about modern slavery, human trafficking, other breaches of law or unethical practices that they suspect are occurring

3 The risks

3.1 The principal areas of risk we face, related to slavery and human trafficking, include:

- 3.1.1 some contract manufacturing of our supply chain
- 3.1.2 professional service staff

3.2 We manage these risk areas through our procedures set out in this policy.

4 Our procedures

4.1 Anti-slavery statement

- 4.1.1 We make a clear statement that we take our responsibilities to help root out modern slavery and human trafficking both within our business and in our supply chains seriously and identify the core measures we as a firm are taking.
- 4.1.2 We make this statement on our website, and we publish past statements to highlight ongoing steps we continue to take to address this issue.

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4.2 Supply chains

- 4.2.1 We check our supply chain to reduce the potential for slavery and human trafficking.
- 4.2.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation. Many vendors, for example, will receive our Master Service Agreement with terms expressing our Anti-Slavery and Human Trafficking Policy.
- 4.2.3 All our significant supplier contracts, for industries considered high risk, should contain an anti-slavery clause. This clause will ask suppliers and their employees to commit not to engage in slavery or human trafficking and to diligence their own supply chain.
- 4.2.4 We work to account for our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check, including reviewing our significant suppliers' identity and level of risk in this area, and making efforts to confirm their adherence to anti-slavery measures in their businesses. Suppliers who do not share our commitment to stamping out slavery and human trafficking will not be selected.

4.3 Recruitment

- 4.3.1 Using agencies
 - (a) Our HR department follows firm policy and only uses agreed, specified, reputable recruitment agencies.
 - (b) To reduce the potential for slavery and human trafficking, we conduct due diligence checks on recruitment agencies before adding them to our list of approved agencies. This includes:
 - (i) Investigating their reputations for sound business and ethical practices
 - (ii) Asking the agency to provide assurances that the appropriate checks have been made on the persons they are supplying to ensure that they are not supplying personnel who may be the victims of human trafficking
 - (c) We keep agencies on the list under regular review and will remove agencies from our lists of preferred suppliers if we are made aware that they turn a blind eye to modern slavery and human trafficking.
- 4.3.2 General recruitment
 - (a) We verify staff are legally able to work in the relevant office.
 - (b) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

- 4.4 If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures (See Reporting slavery).

5 Identifying slavery

- 5.1 There is no typical victim, and some victims do not understand they have been exploited and are entitled to help and support.
- 5.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim.
 - 5.2.1 The person is not in possession of their own passport, identification or travel documents.
 - 5.2.2 The person is acting as though they are being instructed or coached by someone else.

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- 5.2.3 They allow others to speak for them when spoken to directly.
- 5.2.4 They are dropped off and collected from work.
- 5.2.5 The person is withdrawn or they appear frightened.
- 5.2.6 The person does not seem to be able to contact friends or family freely.
- 5.2.7 The person has limited social interaction or contact with people outside their immediate environment.
- 5.3 This list is not exhaustive.
- 5.4 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.
- 5.5 If you have a suspicion, report it.

6 Reporting slavery

- 6.1 Talking to someone about your concerns may stop someone else from being exploited or abused.
- 6.2 If you think that someone is in immediate danger, call the police.
- 6.3 Otherwise, you should discuss your concerns with the Chief Operating Officer or your office Responsible Partner who will decide a course of action and provide any further advice.
- 6.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with the Chief Operating Officer or your office Responsible Partner before taking any further action.

7 Training

- 7.1 We provide specific training to those staff members across the firm who are involved in managing recruitment and our supply chains.
- 7.2 More general awareness training is provided to all staff through training sessions.

8 Monitoring our procedures

- 8.1 We will review our Anti-slavery and human trafficking policy regularly. We will provide information and/or training on any changes we make.

9 Status of this policy

- 9.1 This policy does not form part of any employee's contract of employment and may be updated and amended in our discretion from time to time. Even though the policy does not have contractual force, as with other policies within the firm, we expect all our partners and employees to comply with it in particular by attending training sessions and reporting any concerns about suspected slavery and trafficking in our business, at our clients, or in our supply chains.