

Anti-Slavery and Human Trafficking Statement

We are committed to improving awareness of the practices necessary to combat slavery and human trafficking and to continually assess the risk profile of our business in these areas.

Although we do not have an annual turnover in excess of the £36 million threshold specified in the Modern Slavery Act 2015, we elect to provide an Anti-Slavery and Human Trafficking Statement as evidence of our commitment.

Our Anti-Slavery and Human Trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships and to ensure that slavery and human trafficking are not taking place.

We have considered the risk profile of our business and our business partners. We comply, and will continue to comply, with the highest professional standards. Any business partners, whether they be subcontractors or consultants interacting with our business are required to adhere to these very high standards of conduct.

We have undertaken a review to identify and assess potential risk areas in our relationships with the contractors and the suppliers that we use. At present, our services are provided within the United Kingdom, the Republic of Ireland and Australia. It is our judgement that these countries do not represent areas of unusually high risk of human trafficking.

In order to ensure that all our suppliers and contractors comply with our values, we insist that all of our significant suppliers agree to comply with our Anti-Slavery and Human Trafficking policy within their own business and their supply chains, or have their own equivalent policy in place. We have therefore introduced standard wording into our contracts with significant suppliers and contractors (wherever possible) to acknowledge their agreement and permit us to undertake compliance checks.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we have placed our Anti-Slavery and Human Trafficking policy on our website, which is easily accessible by all of our staff and contractors. Furthermore, all partners and staff will be asked to confirm that they have read and understood the Policy as part of their response to the firm's Annual Compliance Declaration.

Everyone in the firm is encouraged to report any concerns regarding slavery and/or human trafficking in accordance with our whistleblowing policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our anti-slavery and human trafficking statement for the financial year ending 31 July 2019.



E F Butler
Chairman

Anti-Slavery and Human Trafficking Policy

Modern slavery is a term used to encompass slavery, forced and compulsory labour and human trafficking of children and adults, and any activity that leads to the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It is a crime and a violation of fundamental human rights.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our organisation or in any of our supply chains.

We are committed to ensuring there is transparency in our organisation and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners.

Mitigating risk

We manage our risk by:

- requiring our principal suppliers to confirm that they comply with the requirements of the Modern Slavery Act 2015;
- limiting the geographical scope of our operations;
- building long standing relationships with suppliers and
- making clear our expectations of business behaviour.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, all Directors are kept fully briefed.

Scope of the policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees, directors, contractors, external consultants, third-party representatives and business partners.

Roles and responsibilities

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.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy and to notify management as soon as possible if they suspect that a breach of this policy has occurred, or may occur in the future. They are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage.

We encourage 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 in any form is or may be taking place in our own business or in any of our suppliers.

Equality and diversity

We are committed to respecting diversity in all aspects of our work and meeting our obligations under the Equality Act. In line with this, we welcome feedback on any aspect of this policy where there is a question over its adherence to the above legislation.

Data Protection

We are committed to applying this policy in line with the General Data Protection Regulations as set out in our Data Protection Policy.

Recording and monitoring

Reports of actual and potential breaches are reported to the Board.

Commitment and review

The Board looks to the support of staff in making this policy effective. This policy statement, along with other related supporting policies and procedures in use, will be regularly reviewed and revised as and when necessary.

Adopted 15 August 2019