



Statement on Slavery and Human Trafficking

The Modern Slavery Act 2015 (the Act) requires any large commercial organisation operating in the UK to produce and publish an annual slavery and human trafficking statement.

Our organisation

We are a limited liability company governed by strong core values and a keen sense of social responsibility.

We manage our subsidiaries to ensure they have equivalent standards.

This page sets out our ongoing commitment as a responsible business to combat modern slavery and human trafficking.

Our policies

We have a zero tolerance approach to modern slavery and human trafficking and we are committed to ensuring that it has no presence in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place.

Our internal policies and employment procedures are reviewed regularly to ensure compliance with the Act. Particular policies relevant to the combating of modern slavery and human trafficking include our Procurement Policy (which establishes our supplier selection methodology) and Confidential Reporting Policy (designed to encourage and protect any member of staff who wishes to raise any concerns related to the activities of the firm). We offer our staff a confidential reporting line, managed by an independent third party, which is accessible by telephone or online 24 hours a day, 365 days a year. In the last financial year, we extended our confidential reporting line so that it is now available to third parties including our suppliers and contractors.

Due diligence processes

Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made and work only with reputable recruitment businesses. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account – no one earns less than the London Living Wage.

Whilst we outsource few legal services, we have fairly extensive supplier relationships. Each outsourced service supplier is carefully considered as are other suppliers when awarding or renewing business. We ensure that all on-site contractors, who provide staff to work on our London premises, apply the London Living Wage to those staff.

We have continued to review our suppliers on a regular basis and have committed to work with organisations who share our values. We monitor and review the controls undertaken by our suppliers and now require, from our key suppliers, an annual statement of their commitment to our Supplier Code of Conduct.

Our standard supplier contract terms require suppliers to confirm that they comply with all applicable anti-slavery legislation and permit us to audit their compliance with the same.

We are conscious that imported products or services sourced from outside the UK or EU are potentially more at risk of slavery or human trafficking issues. If products or services have to be sourced from such locations, we will look to those suppliers who can demonstrate a commitment to human rights and fair working conditions.

We will not work with any supplier organisation that has been found to have been knowingly involved in either human trafficking or modern slavery.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we continue to provide training to relevant staff as part of their induction and provide refresher training as appropriate.

Our supply chains

Our supply chains include categories within traditionally high risk sectors, in particular labour, transportation and merchandise production. We will ensure all incumbent and potential suppliers are treated fairly and professionally and that the principles of ethical and sustainable procurement are upheld at all times when identifying and selecting suppliers.

Our effectiveness in combating slavery and human trafficking

Our Management Board takes responsibility for implementing this policy statement and its objectives and provides adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chains.

We will continue to monitor and review our policies relating to slavery and human trafficking. If we become aware of any breaches, we will investigate and take such steps as are necessary to ensure that the risk of further breaches occurring is minimised.

This statement is made pursuant to section 54 of the Act and constitutes our slavery and human trafficking statement for the financial year ending 24th May 2023. It is reviewed annually by our Risk and Compliance Department.

It was approved by our board of directors on 24 May 2022.