

MODERN SLAVERY ACT 2015

MENZIES LLP, ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. POLICY STATEMENT

1.1 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. 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 own business or in any of our supply chains.

1.2 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. 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.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

2.1 Human Resources has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it.

2.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.3 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR department.

3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you read, understand and comply with this policy.

3.2 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

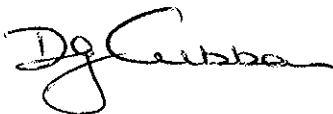
3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the HR department.

3.7 We aim to 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 of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

4. BREACHES OF THIS POLICY

4.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

4.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



David Gibbons
Partner
Menzies LLP

Date: 17/4/2019

INTRODUCTION

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective practices to ensure that modern slavery and human trafficking is not taking place in our business or in any of our supply chains.

ORGANISATION'S STRUCTURE

We are a provider of business and tax advice and financial services to a number of sectors principally Business Services, Property and Construction, Hospitality and Leisure, Retail and Wholesale, Manufacturing, Not For Profit, Technology, Healthcare and Transport and Logistics .

Our services include tax, audit, payroll, business recovery and business and financial consultancy services. We have approximately 450 employees and operate across London, Surrey, Hampshire and Cardiff.

We have an annual turnover of approximately £42 million.

OUR SUPPLY CHAINS

Our supply chains include but are not limited to obtaining office supplies & IT equipment mostly from UK based companies. We also work with Contractors and Consultants during high volume periods & projects.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment 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 anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains by contacting suppliers & asking for confirmation that they comply with the 'Modern slavery act 2015'.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.
- Pre-screening on new vendors within the supply chain

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We communicate this to suppliers, contractors and business partners at the outset of our business relationship with them and reinforce it as appropriate thereafter.

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 aim to develop training for our staff. Modern Slavery (EU/UK) is a training module within our Menzies Online Training Academy which all staff will be required to complete during 2019

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business we intend to develop a specific policy for inclusion in our existing employee handbook. We are in the process of:

- Requiring staff to complete training on modern slavery;
- Continuing to review our existing supply chains;

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 June 2018



David Gibbons
Partner
Menzies LLP

Date: 17/4/2019