

## **Slavery and Human Trafficking Statement**

This statement comprises the Slavery and Human Trafficking statement of Charles Stanley Group PLC (“Charles Stanley” or the “Company”) for the financial year ending 31 March 2016. Charles Stanley is required to make this statement pursuant to section 54(1) of the Modern Slavery Act 2015 (“MSA”). The Statement was approved by the Board on 28 September 2016.

### **The Business:**

Charles Stanley is the holding company for a group of companies which provides a range of wealth management services within the UK. Given the nature of Charles Stanley’s operations, Charles Stanley is at very low risk of exposure to Slavery and Human Trafficking issues.

### **Supply Chains:**

Charles Stanley does not act as a producer, manufacturer, or retailer of any physical goods and, as a financial services provider, it has a relatively straightforward supply chain compared to other sectors. It is not authorised to conduct any financial services outside of the UK, and save for the outsourcing of some information technology testing operations to a company based in India and reliance on overseas counterparties for the conduct of share trading, it has no connection with supplier businesses outside the UK.

### **Policies in relation to Slavery and Human Trafficking:**

Charles Stanley recognises its role in seeking assurance from suppliers of their compliance with Slavery and Human Trafficking laws, while recognising that ultimately this is those suppliers’ responsibility.

The Staff Handbook states the Company has a zero tolerance to Slavery and Human Trafficking and places a duty on all staff to report any potential infringement arising either internally or externally. Detailed background checks are carried out by an independent firm prior to new employees commencing work with Charles Stanley which incorporate protections which should allow for the discovery of any human rights abuses and to ensure that Charles Stanley does not participate in any human trafficking practices. Charles Stanley also has various practices, procedures and policies to ensure compliance with all human rights laws and UK employment laws. Charles Stanley has also committed to pay its staff not less than the current Living Wage (which exceeds the UK’s national minimum wage).

### **Actions Taken and Planned:**

This being the first year in which the Company has been subject to the MSA, its activities have been confined to the assessment and consideration of the implications of the MSA on the business and to commence the planning of relevant changes to its existing procedures to address identified issues. These have included:

- **Due diligence processes:** As a Slavery and Human Trafficking concerns are of a low risk to the business, it is planned to assess and review such matters with existing suppliers as and when contracts are renewed, and at inception with any new supplier. This will also include where appropriate the insertion of provisions into written contracts which oblige suppliers to comply with the MSA and hold them to the same standards as Charles Stanley applies to its own business in this regard. If, after enquiry, any organisation within its supply chain is unable to demonstrate their commitment to their obligations after enquiry, they will not be taken on as a supplier or their services will be terminated. Presently, no KPIs are employed to measure this issue but it is believed that the processes described are and will be effective in its management.

- Training: As part of its plans for 2016/17, the annual compulsory training for all staff in the business will be developed to include Slavery and Human Trafficking to further ensure all staff are aware of all their rights and obligations.
- The Procurement Policy is under review and will include a requirement for suppliers to confirm their compliance with the MSA .

Signed for and on behalf of the Board by:

Paul Abberley