

## **Anti-Slavery Statement**

Date: 25<sup>th</sup> March 2019

This statement is made on behalf of the Brunswick Group LLP and its affiliated entities (the **Brunswick Group**) pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**).

### **Group Structure**

Brunswick Group LLP is an advisory firm specializing in critical issues and corporate relations. Founded in 1987, Brunswick is an organically grown, private partnership with 23 offices around the world.

### **Our Commitment**

The Brunswick Group is committed to ensuring that there is no slavery or forced compulsory human labour in any part of our business or its associated supply chain and ensuring that human rights violations do not occur within the business or any of elements of our supply chain.

### **Supply Chain**

The Brunswick Group strongly believes in maintaining effective transparency amongst all areas of its business. Given the nature of the services we provide, we have a simple supply chain model built around supporting our core business advisory practices and maintaining our global premises, systems and infrastructure.

The service providers that support our business can be broadly grouped as follows:

1. Physical business services – which consists of the services and products we purchase to maintain our global office environments, for example cleaning, security, and stationary/ printer providers;
2. Information services – which consist of the physical and online media sources to which we acquire access in order to support client advisory activities;
3. Data services – which consists of the Information technology services, infrastructure and software tools we procure in order to facilitate the management and storage of data that the business generates or receives;
4. Professional services – which consists of external lawyers, accountants, property agents and insurance specialists; and
5. Travel services – as the business Partners maybe in engaged in travelling for business purposes, the firm engages with travel agents and other booking providers in order to plan these trips.

### **Human Trafficking and modern slavery**

The Brunswick Group are a global advisory firm. We do not have any organisational procedures in place relating to human trafficking. However, we do have a strong clearance process in relation to the client onboarding process.

## **Policy within the HR guide**

The Brunswick Group has implemented a number of human resources, compliance and risk policies which all employees must comply with.

## **Whistleblowing policy**

The Brunswick Group has implemented a confidential process through which employees may formally raise and escalate all issues of potential concern within the business. This includes without limitation issues relating to slavery or forced compulsory human labour.

Under the policy, employees may access EthicsPoint. The information you provide will be sent to us by EthicsPoint on a confidential and anonymous basis. The confidential address is: <https://secure.ethicspoint.eu/domain/media/en/gui/105008/index.html>

## **Wider Community**

The Brunswick Group is committed to assisting and promoting human rights initiatives and other charitable causes. For further details please see <https://www.brunswickgroup.com/about-us/supported-charities/>.

## **Anti-corruption and Business Ethics**

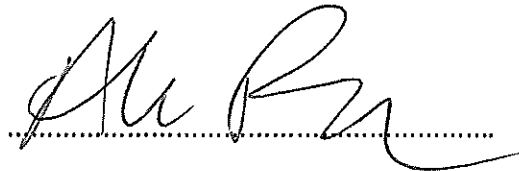
- The Brunswick Group requires all of its employees to adhere to its core compliance policies which cover the areas of greatest perceived risk for the business.
- The Brunswick Group maintains a zero-tolerance approach to breaches of the high ethical standards and practice it expects from its employees.
- All new employees are required to undertake online compliance training which is tracked and recorded. Existing employees must also undertake this training at least once again on an annual basis.
- Where ethical standards of any particular individual are not being maintained at our high standard, it will be escalated to the appropriate line manager and human resources.

## **Compliance Measures**

- We are taking a risk-based approach to the assessment of particular suppliers in the context of the Act.
- We will use reasonable efforts to include an obligation in our commercial agreements that require suppliers (and any sub-contractors they deploy in performance of services for us) to comply with the Act.
- We will use reasonable efforts to reserve for ourselves a right of audit in our commercial agreements with suppliers in the event that we suspect that a supplier is in breach of the Act.
- We will use reasonable efforts to include a termination right in our commercial agreements with suppliers in the event that we have reasonable evidence to suggest that a supplier is in breach of the Act.
- The Brunswick Group is actively promoting its Whistleblowing Policy to its employees and is reminding them that they are under an obligation to report and escalate any concerns they may have of any slavery and human trafficking within our organisation and supply chains.

## Consequences of non-compliance

- Where employees do not comply with strict HR guidelines within the HR handbook, disciplinary action will be taken, and in severe cases will result in dismissal.
- Compliance training is updated annually, and all employees must complete it within a specified timeframe. Failure to do so will result in escalation to the Managing Partner of the region. Failure or refusal to complete compliance training after a prolonged period will result in dismissal.



Sir Alan Parker

Chairman



Helen James

Group Chief Operating Officer