



## Slavery and Human Trafficking Statement

This statement comprises the Slavery and Human Trafficking statement of Tilney Group Limited (now Tilney Smith & Williamson Limited) ('Tilney', 'Tilney Group' or the 'Company') and its subsidiary companies for the financial year ended 31 December 2019.

### Organisation Structure, the Business and Supply Chains

Tilney Group is the holding company for a group of companies, which provides a range of wealth management services within the UK.

- Tilney Investment Management Services Limited is a leading investment manager.
- Tilney Financial Planning Limited provides financial advice.
- Tilney Services Limited (now TS&W Services Limited) is a service company for the Tilney Group.
- Tilney Discretionary Portfolio Management Limited provides wealth management services.

By virtue of Tilney Group's operations, the Company is at very low risk of exposure to the modern slavery and human trafficking issues. We will not tolerate modern slavery and human trafficking within our workforce and expect the same from our supply chain.

Tilney Group does not act as a producer, manufacturer, or retailer of any physical goods and, as a financial services provider, it has a straightforward supply chain compared to other sectors. Our main suppliers are custodians, IT service providers, landlords, transaction advisers, audit services, legal services, facilities management, mailing houses and marketing. While we consider our suppliers to be at relatively low risk of engaging in practices of modern slavery and human trafficking, we nevertheless remain committed to preventing the occurrence of any such practices both in our business and our supply chain.

### Policies in relation to Slavery and Human Trafficking

As part of our commitment to meeting the requirements of the UK Modern Slavery Act 2015, and as a result of a broader policy review, our Employee Handbooks and employment policies continue to be reviewed to ensure relevant policies reflect our stance on modern slavery and human trafficking.

Our Whistleblowing Policy encourages and enables employees or third parties to raise any concerns confidentially. Tilney monitors whistleblowing reports to ensure that modern slavery and human trafficking is not occurring within its business or supply chain. To facilitate reporting, a number of avenues are available for employees and third parties to raise concerns; once raised, allegations are independently investigated and reported upon to the Board on a periodic basis, in line with UK best practice.

In line with our Employment Vetting and Referencing Policy, Tilney also carries out detailed checks on all recruits using an independent third party company, prior to their commencement with the business, to ensure the integrity of new employees.

### Due Diligence

A risk-orientated due diligence exercise is carried out with our major suppliers to ensure that they are compliant with the Modern Slavery Act 2015. Tilney is committed to ensuring that all contractual agreements with third party suppliers contain obligations to ensure compliance with the UK Modern Slavery Act 2015.

### Risk Assessments

Tilney continues to monitor, assess and manage risks on an on-going basis in accordance with its risk management framework.

## Training

Tilney is committed to promoting ongoing awareness of modern slavery and human trafficking issues and to provide appropriate training to all Tilney employees as required.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ended 31 December 2019 and will be reviewed and updated for each financial year.



Approved by the Board.

Chris Woodhouse

Chief Executive Officer