

STATEMENT ON SLAVERY AND HUMAN TRAFFICKING

Introduction

This statement comprises the Slavery and Human Trafficking statement of Tilney Smith & Williamson Limited and its subsidiary companies for the financial year ended 31 December 2020, pursuant to section 54(1) of the Modern Slavery Act 2015 which requires organisations to publish a statement each financial year to set out the steps, if any, it has taken to protect against slavery and human trafficking.

The statement is published in relation to the Tilney Smith & Williamson group as a whole, but in particular is made on behalf of the following UK entities:

Tilney Smith & Williamson Limited

TS&W Services Limited

Tilney Discretionary Investment Management Limited

Tilney Investment Management Services Limited

Tilney Financial Planning Limited

Smith & Williamson Holdings Limited

Smith & Williamson LLP

Smith & Williamson Fund Administration Limited

Smith & Williamson Investment Management LLP and

Smith & Williamson Corporate Services Limited.

Organisation Structure

Tilney Smith & Williamson Limited is the holding company for a group which provides a range of services, including wealth management, accountancy, audit, tax, and financial advisory services to a range of clients. The group has offices in the UK, Ireland and the Channel Islands only.

Relationships with third parties

We are committed to ensuring our business and supply chain are free from any slavery or human trafficking. Due to the nature of our operations, the group is at low risk of exposure to these issues and our supply chain is not complex. Our suppliers, service providers and outsourcing arrangements are predominantly with UK based entities and include custodians, IT service providers, facilities management or other providers who are themselves regulated entities, for example legal or audit services.

Due diligence procedures are carried out with our major suppliers and contractual arrangements with our material suppliers are reviewed to ensure we can have confidence that they have sufficient procedures to protect against any slavery or human trafficking taking place in their business or supply chain.

Our tender process for contracts for office services, which are outsourced, includes confirmation of the steps the potential suppliers take to ensure their businesses are free from modern slavery and human trafficking. The due diligence process includes verifying that they have sufficient policies and procedures in place to ensure fair treatment and pay of workers, adequate whistleblowing procedures and confirming that all those employed in the provision of services have the necessary documentation to legally work in the UK. Contractors working in our premises also have the right to protection under Tilney Smith & Williamson's whistleblowing policies.

Policies

As policies are being developed for the combined group following the merger of Tilney and Smith & Williamson, we are continuing to review policies and employee documentation to ensure that provision is made to ensure staff can recognise and report any risk of modern slavery. Training is to be introduced across the business to new joiner inductions.

Our Whistleblowing Policy encourages and enables employees or third parties to raise any concerns confidentially.

Approved by the Board.

A handwritten signature in black ink, appearing to read 'Chris Woodhouse', with a long, sweeping tail.

Chris Woodhouse

Chief Executive Officer