

Peter Lynn and Partners – Ethical Employment and Modern Slavery Statement

This statement is made by Peter Lynn and Partners. It is a statement made in accordance with Section 54 of the Modern Slavery Act 2015 and covers the financial year from 1 April 2019 to 31st March 2020.

Our business is office-based and our primary supply chain categories support these operations.

Our Policies on Slavery and Human Trafficking

Peter Lynn and Partners recognise their responsibility to be aware of their organisational and supply chain Modern Slavery risks. We have therefore taken the following steps:

- in October 2019 we introduced a new Ethical Employment Policy. Our policy outlines our zero tolerance approach to Modern Slavery of any kind within our operations and supply chain and has been approved by the firm's Partners. Our policy sets out the standards we expect of everyone working with us or on our behalf to support and uphold our policy commitments and provides guidelines for employees, partners and agency workers to report any suspicions or concerns relating to compliance with the policy
- revised our whistleblowing policy to provide a mechanism for reporting any concerns relating to Modern Slavery or Ethical Employment in confidence. This policy is contained in our internal office manual

Risk Assessment Processes

Reflecting the Welsh Assembly Government Code of Practice on Ethical Employment we recognise that due diligence activities to combat slavery and trafficking are required across our supply chains and the need for a consistent risk based approach to be adopted. In 2019 we carried out a supplier risk profiling programme and we identified the following risk categories to assess heightened risks of modern slavery:

- supplier type – cleaning, catering, facilities management, travel, IT support/equipment and professional services
- geographical location
- the availability of documentation evidencing the supplier's compliance procedures
- supplier willingness to provide contractual assurances

Due Diligence Processes

We have undertaken or are in the process of undertaking the following:

- updating our contractual terms with suppliers to include appropriate Modern Slavery provisions
- included a statement on our commitment to Modern Slavery on our website which is signposted in our client terms and conditions

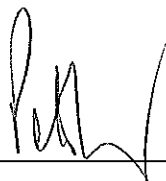
- requiring suppliers to provide, where appropriate, documentary evidence of their compliance with the Modern Slavery Act
- obtaining confirmation from suppliers that they have read and will comply with our Supplier Code of Conduct and Ethical Employment Policy;
- we have prioritised training for HR and Accounts function staff on Modern Slavery and on the requirements of our associated policies.

Measuring Effectiveness – Performance Indicators

In order to monitor the effectiveness of the steps we have taken to seek to prevent slavery and trafficking taking place in our business and supply chains we are or will be:

- Reviewing the effectiveness of our Ethical Employment and Modern Slavery Policy and the Supplier Code of Conduct
- Testing the awareness of staff on the risks of Modern Slavery and the firm's internal processes to address this, as part of a rolling risk and training programme
- Continuing to monitor and consider responses of those suppliers with whom we have and are corresponding with in relation to our Modern Slavery requirements
- Continuing with our supplier risk profiling programme

Signature: _____



Peter Lynn, Senior Partner, Peter Lynn and Partners