

Modern Slavery Policy Statement 2019

In accordance with the Modern Slavery Act 2015, Palmer and Howells Limited (“Palmer and Howells”) is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively “human trafficking and slavery”). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Accordingly, Palmer and Howells will not knowingly use unlawful child labour or forced labour in any of the utilities and/or other commodities, products and/or services it provides, nor will it accept commodities, products and/or services from suppliers that employ or utilise child labour or forced labour.

Rationale

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This policy statement thus defines Palmer and Howells commitment to ensuring that human trafficking and slavery does not exist within its own business, but also provides how we will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship (and especially from within its supply chain).

Palmer and Howells Procurement Director oversees this area as a senior compliance officer (Anti-Slavery and Human Trafficking Officer) and will take appropriate steps to ensure not only its own compliance but also that these requirements are followed by its suppliers, subcontractors and/or business partners (collectively by its “Suppliers”) worldwide.

Definitions

Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child’s education, or to be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

Palmer and Howells Commitment

Palmer and Howells is committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our stance reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with suppliers and customers and make clear our expectations of business behaviour. We ensure that all our suppliers have either the mandatory Modern Slavery Act policy in place or a statement of assurance as well as ethical and 'no-child labour' policies, regardless of turnover.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have an ethical policy and systems in place to encourage the reporting of concerns and the protection of whistle blowers. Any breach of this Policy (including by a Supplier) can be reported (in confidence, if required) by contacting the company Procurement Director (in his capacity as Palmer and Howells Anti-Slavery and Human Trafficking Officer).

Supplier Adherence to our Values

All suppliers are required to adhere to the following:

- We have a zero-tolerance stance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values
- Complying with legislation and regulatory requirements, making suppliers and customers aware that we promote the requirements of the legislation.
- Considering modern slavery factors when making procurement decisions.
- The company will not source from suppliers where suppliers do not demonstrate their commitment to ensuring that slavery and human trafficking are not taking place in their own business or supply chains.
- The company will not work with any organisation or supplier that either has or is found to be knowingly involved within wither human trafficking or modern slavery.

- If a supplier is found in violation of this policy, we will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier (as above). Other (remedial) steps shall be taken as determined by the Anti-Slavery and Human Trafficking Officer to be necessary to address the violation and seek to prevent its reoccurrence.
- Upon request, suppliers must be able to demonstrate compliance with this Policy to the reasonable satisfaction. Palmer and Howells may perform periodic audits on this Policy and Suppliers are expected to fully co-operate with any such audit.
- Suppliers will certify compliance with this Policy and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.