

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

**This statement sets out the actions taken by Mattioli Woods plc to identify and eliminate all potential modern slavery risks related to our business.**

It also explains the steps that have been put in place aimed at ensuring there is no modern slavery or human trafficking in our own business and our supply chains. This statement relates to actions and activities during the financial year ended **31 May 2018**.

As part of the financial services sector, Mattioli Woods recognises it has a responsibility to take a robust approach to modern slavery and human trafficking. We are therefore **absolutely committed** to preventing both activities (in all its forms) in all areas of our business, and in our supply chains.

### **Organisational structure and supply chain**

Mattioli Woods is one of the UK's leading wealth management providers with total assets under management, administration and advice of more than £8.7 billion. Our supply chain is one of general business suppliers, as well as specialist services such as investments, pensions, property and employee benefit services. All of which are professional services based in the UK, rather than products or commodities sourced from high risk countries. Further, Mattioli Woods operates in (and all its supply chain is confined to) the **United Kingdom**.

The following process allows us to assess whether a particular activity is high risk when it comes to modern slavery or human trafficking:

- 1) Mattioli Woods holds a **risk register** of all its operations, regularly reviewing this in the context of its supply chain and business operations.
- 2) There are **no high-risk activities** identified in relation to modern slavery or human trafficking because we only operate in the UK in financial services and do not source products or services from higher risk regions.

### **Anti-slavery initiatives at Mattioli Woods**

#### General policies

Our general operational policies are developed through consideration of our group business activity as well as the markets we operate in within our operations function.

We achieve this through a **multi-disciplined approach** where the finance, HR, compliance and risk teams collaboratively review the group's business activity and supply chain. Policies are reviewed and approved annually by the plc board.

## Specific policies

Mattioli Woods operates the following specific policies that describe our approach to the identification of modern slavery risks and human trafficking and the steps to be taken to prevent both in our operation.

### 1. Whistleblowing policy

Mattioli Woods encourages all its employees, as well as consultants, contractors and other business partners (collectively referred to as staff for the purposes of this statement) to **report** any concerns related to the direct activities, or the supply chains, of the group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for staff to make disclosures – without fear of retaliation – independently to our non-executive chairman **Joanne Lake**. Employees, clients or others who have concerns can follow either our whistleblowing or complaints procedure.

### 2. Employee code of conduct

Mattioli Woods' code of conduct makes clear to staff the actions and behaviour expected of them when representing the group. Mattioli Woods strives to maintain the highest standards of **employee conduct** and **ethical behaviour** in all its operations and when managing its supply chain.

### 3. Supplier code of conduct

Mattioli Woods is committed to ensuring its suppliers also adhere to the highest standards of ethics. Suppliers are required to demonstrate they provide safe working conditions where necessary, treat workers with **dignity** and **respect**, and act ethically and within the law in their use of labour. We work with suppliers to ensure they meet our standards of the code and improve their workers' working conditions if needed. Any serious violations of the supplier code of conduct will lead to the **termination** of the business relationship.

### 4. Recruitment/agency workers policy

Due to the nature of our regulated business, Mattioli Woods doesn't use agency or temporary workers. However, if there was ever a need for us to do so, we would ensure we would only use **reputable employment agencies** by validating their recruitment practices before commencing with any hiring. With all our recruitment, we fully verify new workmates through an independent third-party company that specialises in identifying any fraudulent data or information, which informs us of anything **suspicious**.

### 5. Due diligence of suppliers

Mattioli Woods undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers too. The group's due diligence and reviews include:

- broadly **mapping the supply chain** to assess product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier
- regularly reviewing all aspects of the supply chain
- conducting **supplier audits or assessments** through our own staff or third-party auditor, which has more focus on slavery and human trafficking where general risks are identified
- creating an **annual risk profile** for each supplier
- taking steps to improve sub-standard suppliers' practices, including providing advice to suppliers (sometimes through a third-party auditor), and requiring them to implement **action plans**
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular
- asking suppliers to **confirm their compliance** with our standards and requirements before providing products or services to our business
- invoking **sanctions** against suppliers that a) fail to improve their performance in line with an action plan or b) seriously violate our supplier code of conduct – this includes the **termination** of the business relationship

#### Investigations/due diligence

Any known, or suspected, instances of modern slavery or human trafficking are investigated through our risk management and compliance functions.

#### The role of staff and HR

To better understand and respond to potential modern slavery and human trafficking risks, our employees are given awareness training (see more below), while our suppliers are also made aware of our expectations.

We also review our salaries on an annual basis to ensure our workmates are not paid below the **UK's national minimum wage**. We ensure we provide a benefits package to all employees – including pension auto enrolment – regardless of the employee's role within our business. We want to ensure we are **fair and consistent** throughout our business and locations.

#### **Performance indicators**

Following the introduction of the **Modern Slavery Act (2015)**, the group reviewed its key performance indicators. As a result, we:

- require all staff to have complete **ongoing training** on modern slavery
- have a **risk assessment document** verifying potential suppliers before we use them in our business
- regularly review our **existing suppliers** to ensure they meet our standards

### Ongoing training

Mattioli Woods requires all workmates to complete **online training** on modern slavery and human trafficking regularly.

As well as this, we **raise awareness** of modern slavery and human trafficking issues to staff, having a page on our intranet and circulating a series of reminder emails.

The awareness programme covers:

- the basic principles of the Modern Slavery Act (2015)
- how staff can **identify** and **prevent** modern slavery and human trafficking
- what staff can do to flag up potential modern slavery or human trafficking issues to the relevant parties within the group
- the external help available, for example through the [Modern Slavery Helpline](#), the [Gangmasters and Labour Abuse Authority](#) and the ['Stronger Together' initiative](#)

### Risk assessment document

We regularly review and assess the risk of slavery and human trafficking in relation to various aspects of the business by identifying:

- the signs of modern slavery and human trafficking
- the **initial steps** to be taken if modern slavery or human trafficking is suspected
- how to escalate potential modern slavery or human trafficking issues to the **relevant parties** within the group
- the external help available (as above)

### Reviewing of existing suppliers

Our Anti-Slavery and Human Trafficking Policy reflects the group's commitment to acting **ethically** and with **integrity** in all business relationships, implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is **not taking place** anywhere in our organisation, or supply chains.

Therefore, we have also identified:

- what messages, business incentives or **guidance** can be given to suppliers and other business partners and contractors to implement anti-slavery policies
- what steps we should take if suppliers or contractors do not implement anti-slavery policies in **high-risk scenarios**

## **Board approval**

This statement has been approved by the group's board of directors and non-executive directors, who will review and update it annually.

Ian Mattioli MBE

**Chief executive officer**