evelyn PARTNERS

Modern Slavery and Human Trafficking Statement

Evelyn Partners Group Limited

Introduction

This statement on Modern Slavery and Human Trafficking pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") is made on behalf of Evelyn Partners Group Limited and its subsidiary companies (the "Group") for the financial year ended 31 December 2021. The Group changed its name from Tilney Smith & Williamson Limited on 14 June 2022, with its subsidiary companies changing their names on the same date to the Evelyn Partners brand.

Scope

The statement is published on behalf of the Group as a whole but in particular on behalf of the following UK entities:

- Evelyn Partners Services Limited (formerly TS&W Services Limited)
- Evelyn Partners Discretionary Investment Management Limited (formerly Tilney Discretionary Investment Management Limited)
- Evelyn Partners Investment Management Services Limited (formerly Tilney Investment Management Services Limited)
- Evelyn Partners Financial Planning Limited (formerly Tilney Financial Planning Limited)
- Evelyn Partners LLP (formerly Smith & Williamson LLP)
- Evelyn Partners Fund Solutions Limited (formerly Smith & Williamson Fund Administration Limited)
- Evelyn Partners Investment Management LLP (formerly Smith & Williamson Investment Management LLP)
- Smith & Williamson Corporate Services Limited.

Organisation

The Group provides a wide range of services across its subsidiaries and connected companies, providing integrated wealth management and professional services, from financial planning, investment management, online investment services and fund solutions to accountancy, tax, assurance and advisory services. The company operates under the Evelyn Partners brand and the Bestinvest sub-brand, the dedicated online investment management platform. The Group operates from offices in the UK, Ireland and the Channel Islands.

Supply Chain

Our supply chain is predominately based in locations where our offices are, being the UK, Ireland and the Channel Islands, and the nature of our operations means we have assessed that our group is at low risk of slavery or human trafficking in our business or supply chain. Our supplier and outsourcing arrangements include IT service providers, facilities management or other providers who are themselves regulated entities, for example legal or audit services. However, we have taken steps to protect against modern slavery risks.

Our procurement policy has modern slavery assessments integrated into our procedures. In our tender process for potential suppliers, we require confirmation that they have complied with the Act and evidential proof of their policy or statement. Our ESG questionnaire requires suppliers to confirm they have a Modern Slavery policy and additionally to provide evidence of their policies for including ESG considerations for procurement and supply chains. Our due diligence process requires verification that they have policies for their workers regarding fair treatment and pay of workers, adequate whistleblowing procedures and that those employed in the provision of services have the necessary documentation to legally work in the UK.

Annual due diligence takes place for our material outsourcing arrangements and this requires confirmations that they have taken steps to ensure that their supply chain is free from any modern slavery. Our risk matrix integrates modern slavery considerations into the regulations and laws key risk indicator category.

ESG considerations – Responsible Investment

For our investment portfolios, we are signatories to the UN PRI which promotes Responsible Investment practices which we have integrated across the investment process. This means that we integrate Environmental, Social and Governance (ESG) factors into our investment decisions alongside the more traditional financial metrics such as balance sheet strength, profitability, and sales growth. We don't separate out the role of investment and ESG analysts; ESG analysis is completely integrated within the investment analyst role to ensure joined up outcomes.

As a firm we provide investment services across the whole spectrum of clients, but the bulk of our portfolios are either bespoke discretionary managed portfolios or pre-set in-house managed funds. All monitored stocks and third-party funds are assessed by their respective analysts to identify the material ESG impacts across industry sectors (positive and negative), including modern slavery risks. Investments that score poorly face a higher hurdle to become recommended on our monitored list of securities. We have the ability to negatively and positively screen for ESG considerations at the request of clients and tilt portfolios accordingly, including towards protections against modern slavery risk. We have a few pre-set funds which have investment portfolios with specific ESG objectives including our Evelyn Sustainable Portfolio fund of funds and Sustainable Managed Portfolio Service with a track record of over ten years of ethical and sustainable investment (under our legacy Tilney brand).

Under our previous brand, Smith & Williamson, we are signatories to the 2020 UK Stewardship Code. We will apply for this to be extended to the new Evelyn Partners brand in the October 2022 submission round. We are also a member of the collaborative engagement group Find It, Fix It, Prevent It, an investor-led project to increase the effectiveness of corporate efforts against modern slavery in UK companies and their supply chains. Originally set to focus on the hospitality industry this is currently being extended to the construction industry. These two sectors being the most vulnerable to modern slavery.

Over the next year, we will continue discussions with Find it, Fix It, Prevent It about joining a collaborative engagement as a lead on an initiative for the construction sector. This will aim to address modern slavery risks and steps that can be taken on behalf of investors to ensure compliance in the sector. However, details have not yet been confirmed.

We will also be considering ways in which we can integrate client sustainability requests (including modern slavery risks) at a product level over the next year, particularly in light of developing regulations being introduced into the financial services sector.

Monitoring and training

As mentioned above, annual due diligence takes place for our material outsourcing arrangements.

New joiner and mandatory training has been introduced to make staff aware of the risks and be able to recognise instances of modern slavery.

Our Whistleblowing Policy encourages and enables staff to raise any concerns confidentially and contractors working on our premises also have the right to protection under this policy.

This statement has been considered by the Corporate Responsibility Committee and approved by the Board.

Chris Woodhouse

Chief Executive Office