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 2022. 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 Asset Management 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, a 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 Jersey. We do have services provided by suppliers globally, including but not limited to, India, US and Switzerland. 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 by requesting from suppliers, during a tender process, for evidence of their modern slavery policy. We also ask new suppliers to abide by our Code of Conduct.

Our procurement policy has modern slavery assessments integrated into our procedures. During the tender process we require confirmation that the supplier complies with the Modern Slavery Act and request evidential proof of their policy or statement. We are introducing in Q4 2023 an Environmental, Social and Governance (ESG) questionnaire, that will require Tier 1 and Tier 2 suppliers to confirm they have a Modern Slavery policy and whistleblowing procedures, in addition to other ESG indicators, and can provide evidence to support these. It is our intention to request our existing Tier 3 suppliers to confirm they have a Modern Slavery policy. Our due diligence process additionally requires verification that they have policies for their workers and contractors regarding fair treatment and pay of workers and contractors, 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 ESG factors into our investment decisions alongside the more traditional financial metrics such as balance sheet strength, profitability, and sales growth. We do not 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 may be subject to further checks and conditions 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 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. We are signatories to the 2020 UK Stewardship Code.

We are also a member of the collaborative engagement group Find It, Fix It, Prevent It, an investor-led initiative 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 has been extended to the construction industry. These two sectors being the most vulnerable to modern slavery. We have joined two engagements as part of this collaboration, one as an engagement lead and the other in a supporting role. Both of these are focusing on companies within the UK construction sector. These engagements will aim to address modern slavery risks and steps that can be taken by companies to ensure compliance in the construction sector.

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.

We are in the process of developing our new joiner and mandatory training materials to ensure staff are aware of the risks and are 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 approved by the Board.

For and behalf of the Board:

Chris Woodhouse

Chief Executive Office

Date: 30 June 2023