



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 2023.

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)

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

We are signatories to the UN Principles of Responsible Investment (UN PRI). This means we integrate the ongoing consideration of material non-financial ESG factors within our investment process. We believe that companies with high standards of governance, that act responsibly have sustainable business models, and which make a positive contribution to the communities they serve and operate within, are less risk long-term investments. Our responsible investment and range of sustainable solutions include bespoke discretionary managed portfolios and in-house managed funds, where both positive and negative screening can be applied for ESG considerations, including modern slavery risks. Investments that score poorly or have significant controversies may be subject to further checks to meet our sector specialist inhouse criteria to become recommended on our monitored list of securities. We have two in-house sustainable Open-Ended Investment Company (OEIC) funds and a Sustainable Managed Portfolio Service (SMPS) which have a track record of over ten years of ethical and sustainable investment. As responsible investors, we are also engaged in the stewardship of the businesses in which we invest on behalf of our clients. We use our influence as shareholders to improve investee companies' own ESG practices and performance. We do this by engaging (directly and collaboratively with other industry bodies) with companies where we have material shareholdings and by voting at shareholder meetings. As good stewards of our client's capital, we seek to encourage better business practices to both enhance value and reduce potential risks including social and environmental risks.

Evelyn Partners became a signatory of the UK Stewardship Code following the successful application as a merged business in October 2022. We are in the process of reviewing our annual Stewardship Code Report and plan to resubmit by 30 April 2024 for approval.

The Group participates in industry working groups for stewardship initiatives and is a member of the following bodies:

- The Investment Association
- Personal Investment Management and Financial Advice Association (PIMFA)
- The Investing and Saving Alliance (TISA)

The Group is a member of the collaborative engagement platform *Find It, Fix It, Prevent It*, an investor-led multi stakeholder project aiming to increase the effectiveness of corporate efforts against modern slavery. 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. During 2023 we took part in three engagements as part of this collaboration to address modern slavery risks and to identify steps that can be taken by these three companies to ensure compliance with mandatory requirements.

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We will also be considering ways in which we can further integrate client sustainability preferences and requests (including modern slavery risks) at a product and service 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:



Paul Geddes

Chief Executive Office

Date: 8 March 2024