

Anti-slavery and human trafficking policy

Policy statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We recognise that modern slavery risks can evolve over time. Accordingly, we review and strengthen our controls and practices on a regular basis. We publish an annual modern slavery and human trafficking statement approved by senior management, published on our website and submitted to the UK Government modern slavery statement registry.

Our annual statement sets out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

About this policy

This policy sets out our responsibilities and those of individuals working for or on our behalf, explains how to identify modern slavery risks, and provides guidance on reporting concerns. This policy applies to all persons working for us or on our behalf in any capacity.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, partners, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners (referred to as 'personnel').

Responsibility for the policy

The CEO has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Head of Accreditations has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Heads of Accreditations and Risk and Compliance.

Our business and supply chains

We operate as a UK-based professional services organisation. Our supply chains are primarily service based. While our overall risk profile is considered lower, risks may still arise through third-party suppliers and recruitment practices. We seek to improve transparency and oversight of our supply chains on an ongoing basis.

The Firm does not use migrant labour and all personnel are paid at or above the Living Wage Foundation rate. The standard terms and conditions of

employment/contract for services for all personnel allows them to terminate their employment / contract with the Firm at any time in accordance with those terms.

The Firm operates an Equal Opportunities and Anti- Harassment Policy, has this Anti-Slavery and Human Tracking Policy on its website and intranet and is alert to the issues relating to health and wellbeing raised by the SRA, Law Society and LawCare. The Firm operates a Whistleblowing Policy and a mindfulness charter.

Risk assessment and due diligence

We adopt a risk-based approach to assessing and managing modern slavery risks, informed by supplier type, location, and use of agency or subcontracted labour. We undertake due diligence proportionate to the perceived risk which may include supplier vetting, contractual controls, and escalation procedures if determined necessary.

A part of its contract with suppliers, the Firm requires suppliers to:

Confirm that they have taken steps to eradicate modern slavery within their business;

Require their own suppliers to provide similar confirmations as to modern slavery;

Pay their employees at least the national minimum wage/national living wage (as appropriate) if they are based in the UK; and

Pay their employees any prevailing minimum wage applicable within their country of operations if they are based overseas.

The Firm measures its progress in relation to modern slavery and human trafficking by reference to performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

Number of personnel that have completed mandatory training;

Number of suppliers that have completed the modern slavery part of the supplier questionnaire;

Number of suppliers that have undertaken their own awareness and training programme;

Number of reports made by personnel that indicate their awareness of and sensitivity to modern slavery issues; and

Number of relationships that the Firm has terminated in the light of doubts about a supplier's commitment to the eradication of modern slavery.

Your responsibilities and how to raise a concern

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Head of Accreditations and your manager as soon as possible, if you believe or suspect that a breach of this policy has occurred, or may occur in the future. Alternatively, you may, if you wish, report in accordance with our Whistleblowing Policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Head of Accreditations.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the interactive employee handbook on BHive.

Training and communication

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who are involved in managing recruitment and our supply chains.

Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Supply chains

We thoroughly check supply chains for material suppliers to ensure the potential for slavery and human trafficking is significantly reduced.

We tell the companies we do business with that we are not prepared to accept any form of exploitation.

All our material supplier contracts contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

Recruitment

Using agencies

Our recruitment team follows firm policy and only uses agreed specified reputable recruitment agencies.

To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

- conducting background checks
- investigating reputation
- ensuring the staff an agency provides have the appropriate paperwork (eg work visas)
- ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying

We keep agents on the list under regular review, at least every 3 years.

General recruitment

We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

We always ensure staff are legally able to work in the UK.

We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures.

Monitoring effectiveness

We monitor the effectiveness of our approach using appropriate qualitative and quantitative indicators and reflect progress and learning in our annual statement.

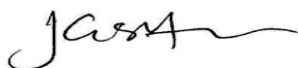
Document Owner and Approval

The Head of Risk and Compliance is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the CMS.

A current version of this document is available to employees on the central knowledge base Oculus.

This procedure was approved by the Chief Executive Officer on behalf of the Firm and is issued on a version controlled basis under their signature.

Signature:



Date: 01/04/2026

Revision History

Date of this revision: 01/04/2026

Date of Next revision: 01/04/2027

Revision date	Previous revision date	Summary of Changes
01/04/2026		Updated to include guidance on Transparency in supply chains: a practical guide updated in December 2025. Amended reporting lines to reflect the departure of the Risk and Compliance Director.