Anti Slavery and Trafficking Statement

Version Control

Policy Title	Anti-Slavery and Trafficking Statement	Date created	04/07/2023
Policy Owner	People and Development	Date last reviewed	06/07/2023
Policy reviewer	People and Development	Date of next review	06/07/2024
Board Approved			

Here are the steps that Brabners LLP has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act) and constitutes our slavery and human trafficking statement for the financial year ending 30th April 2022.

About Brabners LLP

Brabners LLP specialises in enabling commercial, public and third sector organisations and private individuals to achieve their goals. We provide a full-service legal offering to large and mid-sized businesses, SME's, public sector bodies, charities, business owners, entrepreneurs and high-net worth individuals.

We work with clients across a wide range of sectors including, charity and social enterprise, healthcare, housing and regeneration, manufacturing and supply chain, tech, real estate, recruitment, retail and sport.

To find out more about Brabners, please visit our website: www.brabners.com

Our commitment to the principles of the Modern Slavery Act 2015

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour.

We have a zero tolerance policy towards modern slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business and to doing what we can to prevent our business from being used by human traffickers.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or the supply chain.

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Brabners is Limited Liability Partnership under English Law and provides legal and consultancy services. The Firm has 466 people and has a turnover of 40.5 million for the financial year ending 30th April 2022.

Supply Chains

Policy Title	Anti Slavery and Trafficking Statement	Date created	04/07/2017
Policy Owner	People and Development	Date last reviewed	06/07/2023
Policy reviewer	People and Development	Date of next review	06/07/2024
Board Approved			



Each department will to a greater or lesser extent have supply chains on which it depends, and the interdependency of the various departments means that one supplier may have dealings with more than one department.

We will require companies who supply us, whether or not they are independently required to comply with the Act, to give us legally binding obligations (as and when contracts are entered into or renewed) to:

- comply with all applicable laws relating to slavery and human trafficking (including the Act);
- undertake their own due diligence into their own supply chains and business partners; and
- ensure that any contracts with their subcontractors have similar obligations.

We conduct due diligence on all suppliers before allowing them to work with the business.

Our anti-slavery policy forms part of our contract with suppliers, we require that they confirm to us that:

- they have taken steps to eradicate modern slavery within their business;
- they hold their own suppliers to account over modern slavery;
- (for UK based suppliers) they pay their employees at least the national minimum wage/national living wage (as appropriate);
- (for international suppliers) they pay their employees any prevailing minimum wage applicable within their country of operation; and
- we may terminate the contract at any time should any instances of modern slavery come to light.

Training

We currently provide in house training so that our people understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

All new colleagues joining the firm are provided with our Anti Slavery and Trafficking Statement, our Anti – Slavery Policy and Anti- Slavery Training as part of their induction.

Our people are required to attend regular training updates.

Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- <u>Anti-Slavery Policy</u> This Policy sets out our stance on modern slavery and explains how our people can identify any instances of this and where they can go for help.
- Recruitment Policy We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all our people to safeguard against human trafficking or individuals being forced work against their will.
- Whistle Blowing Policy We operate a whistleblowing policy so that all our people know that they can raise concerns about how colleagues are treated or practices within our business or supply chain without fear of reprisals.
- Our Business Values this explains the manner in which we behave and what we stand for as an organisation and how we expect our people and suppliers to act.

Policy Title	Anti Slavery and Trafficking Statement	Date created	04/07/2017
Policy Owner	People and Development	Date last reviewed	06/07/2023
Policy reviewer	People and Development	Date of next review	06/07/2024
Board Approved			



Our Performance Indicators

We will maintain a register of all concerns raised and the actions taken pertaining to slavery, forced labour or human trafficking either within our own business or within our supply chains.

We proactively monitor the effectiveness of the steps that we are taking to ensure that modern slavery and/or human trafficking practices are not taking place within our business or supply chain. We maintain systems to encourage the reporting of concerns and incidents related to modern slavery. Any reported concerns will be thoroughly investigated, and appropriate actions will be taken to address them promptly.

Following a review of the effectiveness of the steps we have taken [this year] to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- 1. Enhance Due Diligence: We will strengthen our due diligence processes to assess and monitor suppliers' compliance with anti-slavery and human trafficking requirements.
- 2. Training and Awareness: We will provide regular training and awareness programs for our employees and partners to ensure they remain vigilant and informed about modern slavery risks.
- 3. Collaboration and Engagement: We will engage with industry stakeholders, relevant organisations, and our supply chain partners to share best practices, collaborate on solutions, and promote ethical standards throughout our business operations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30th April 2022.

Approval for this Statement

This statement was approved by

Name Nik White

Position Managing Partner

Date 07/07/2023

Signature

Policy Title	Anti Slavery and Trafficking Statement	Date created	04/07/2017
Policy Owner	People and Development	Date last reviewed	06/07/2023
Policy reviewer	People and Development	Date of next review	06/07/2024
Board Approved			

