

Modern Slavery Act

Carter Backer Winter LLP (CBW) understands the importance of the firm's actions to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022.

CBW recognises that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the Coronavirus pandemic.

CBW is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Carter Backer Winter LLP (CBW):

- CBW offers clients a combination of business and financial insights, ensuring informed decision-making by individuals and businesses
- CBW's practical knowledge is relied upon for effective wealth management, business start-ups and sales, investment in assets and innovation, overseas expansion, tax efficiencies, regulatory compliance and profitable growth.

We currently operate in the following countries:

- CBW operates within the United Kingdom, Europe, Australia and US
- CBW is also an independent member firm of DFK International which is an association of worldwide independent accounting firms and business advisors, operating in 93 countries. This association of independent accounting firms and business advisors brings together strong national firms of public accountants to enable them to provide services of the highest professional standards to their clients.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

High-risk activities

We believe that CBW has no activities that are considered to be at high risk of slavery or human trafficking.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** When policies are put in place, whether these are new or revised they are prepared by The HR Director and reviewed by the Managing Partner.
- **Risk assessments:** Risk assessments for all our suppliers are carried out by individual Partners on an ad-hoc basis as and when new suppliers need to be engaged or a service is to be re-tendered. Risk assessments of recruitment agencies we work with are undertaken by the HR department. We have long-standing relationships with the majority of the agencies we work with and we are assured of their practices from previous experience and their reputation in the marketplace.
- We have obtained written reassurance from all recruitment agencies we are working with that they are compliant with the Act and have also set out this requirement in our Heads of Terms. We will continue to do this for any new agencies we use. Documents proving the right to work in the UK documents are always checked by the HR team for all new employees when they start working for the company. Temporary staff from agencies are always thoroughly checked prior to appointment. All employees are given an employment contract and are made aware of all internal policies and procedures as well as their statutory entitlements and other benefits.

- **Investigations/due diligence:** The Managing Partner & HR Director are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. CBW also undertakes due diligence when considering taking on new clients and suppliers and regularly reviews its existing clients and suppliers.
- **Training:** As CBW's business activities are not considered high risk, we do not believe we need to train employees at this time. We will continue to review this and implement training should the risk level change.
- **Recruitment policy:** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency.
- **Social media policy:** We may have other relevant policies to which they can refer, for example a corporate social responsibility policy, which should be accompanied by the steps taken to implement the policy and any examples where it has been used to address slavery and human trafficking risks

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact the Managing Partner in confidence.
- **Employee Values:** Our values make clear to employees the actions and behaviour expected of them when representing our company. We strive to maintain the highest standards of employee conduct and ethical behaviour.
- **Procurement code of conduct:** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers/clients are required to complete a KYC form which is our 'Get to know your client' form where this information is obtained.
- **Due diligence**
 - Carter Backer Winter LLP will be conducting due diligence when considering taking on new clients, and the regular reviews of its existing clients. Our due diligence and reviews might include:
 - Evaluating the modern slavery and human trafficking risks of each new supplier
 - Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
 - Conducting supplier audits or assessments through third party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified
 - Creating an annual risk profile for each supplier
 - Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship