

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

This policy applies to all persons working for Cass Hayward or on our behalf in any capacity, including employees at all levels, partners, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

The Company strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers and contractors will hold their own suppliers to the same high standards.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights. The Company is committed to enforcing the Modern Slavery Act (2015).

The Company expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- To conduct business with integrity in an ethical, honest and fair manner, and to expect the same from those with whom we do business.
- To have a zero-tolerance approach to modern slavery in our organisation and our supply chains;
- To recognise that prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy; and

Cass Hayward are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.

Consistent with our risk based approach we may require suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the code of conduct.

If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationship.

TRANSPARENCY STATEMENT.

The UK Modern Slavery Act 2015 requires businesses with annual turnover greater than £36m to provide disclosure concerning their efforts to address the issues of slavery and human trafficking in their supply chains. Cass Hayward do not meet this criteria but nevertheless have taken steps to raise awareness of the issues covered by this policy both internally by staff briefing and externally through additions to their website. This will be reviewed by the Partners for effectiveness at least annually.

Signed: *Ed Atherton*
Partner (LLP Member)

Date: 01/04/2019