

Anti-Slavery and Human Trafficking Statement

Financial year ending 30 April 2020

1. Chief Executive's Statement

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Gateley (Holdings) Plc's slavery and human trafficking statement for the financial year commencing 1 May 2019 and ending 30 April 2020. This statement covers the activities of Gateley (Holdings) Plc and its wholly-owned subsidiaries, the trading entities being: Gateley Plc, Entrust Limited, International Investment Services Limited, Kiddy & Partners Limited, Gateley Capitus Limited, Gateley Hamer Limited, Gateley Vinden Limited and T-three Group Limited (and References to "Gateley", "we", "us", "our", the "group" or the "company" are to Gateley (Holdings) Plc and the members of its group). All references in this statement to policies and systems in place are relevant to all of the companies constituting the Gateley group.

2. Gateley (Holdings) Plc

Gateley (Holdings) Plc is the English holding company of a group of companies providing legal and other professional services. The shares of Gateley (Holdings) Plc are admitted to trading on AIM. The group has an annual turnover in excess of £36 million with both the company and Gateley Plc individually having turnovers in excess of this amount. Gateley employs over 1000 people, predominantly professionally qualified and highly skilled people, across 15 offices in England, Northern Ireland, Ireland and Dubai. To find out more about the nature of our business, please click <http://gateleyplc.com/about-us/>.

The services provided by members of the Gateley group include legal advice, human capital consultancy (including people leadership assessment and development and behavioural change), property advice and services (including easements and wayleaves for utilities infrastructure, CPOs, land referencencing, public enquiries, capital allowances on commercial property, land remediation relief, tax incentives and dispute resolution), independent pension trustee services and international growth consultancy. These services are provided predominantly to clients based in the United Kingdom.

Due to the nature of the services we provide and the jurisdictions in which we provide those services, we consider our supply chain to be our primary area for focus for the purposes of addressing the risk of slavery and human trafficking occurring within our business. We have a broad range of suppliers both in size and in terms of the products and services provided. These supplies include cleaning and catering, hospitality, IT equipment, software and consultancy, payroll, audit, counsel, office consumables such as stationery and office fit out and maintenance. With the exception of cleaning services, we do not typically outsource our requirements for services, preferring to undertake these in-house. Although most of the suppliers that we deal with are based in the United Kingdom, some have overseas parent companies and others have international supply chains themselves. It is possible that some of these include jurisdictions where there is a higher risk of modern slavery and/or human trafficking. We like to work closely with our suppliers and have many long term supplier relationships. However, we do not consider that we are dependent upon any particular supplier.

Gateley is opposed to slavery and human trafficking and is committed to preventing it from occurring within its business and supply chain. We expect our suppliers to be similarly opposed to slavery and human trafficking.

3. Policies

As a provider of legal and professional services, the maintenance of the highest ethical standards is core to our business and the services we provide. As you would expect we have a broad range of policies, procedures and training programmes in place (which include regulated matters such as slavery and human trafficking, bribery and corruption, tax evasion and money laundering) to underpin this approach.

We have an office manual and provide guidance in areas such as appointment of suppliers and recruitment to help our staff to provide our services and carry on our business to the highest standards.

We work with external bodies to support us in this such as Stonewall and Investors in People and regularly engage with our staff and clients to seek feedback. Members of our group are authorised or accredited by industry bodies for example the Solicitors Regulation Authority, the Royal Institute of Chartered Surveyors, Lexcel, ISO27001 and the CQS. In achieving such accreditations, we are often required to demonstrate our ethical approach to carrying on our business.

4. Due diligence, Risk and compliance

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted procedures to identify slavery and human trafficking risks associated with our suppliers.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistle blowers.

We do not consider that we operate in high risk sectors or locations because we provide professional services and our offices and clients are predominantly based in the United Kingdom.

We evaluate the nature and extent of our exposure to the risk of slavery and human trafficking occurring in our supply chain by assessing the risk relating to our suppliers. Introducers of new suppliers are asked to undertake a risk assessment covering factors such as the origin of manufacture and supply and the nature of, and location from which, services are provided. Suppliers are assessed as low, medium or high. Depending upon the level of risk identified, we may undertake more detailed due diligence with the supplier to enable us to assess the situation in more detail before we accept them as a supplier. Appointment of any supplier categorised as medium or high risk does not proceed without referral to our Money Laundering Reporting Officer and ultimately to one of our management boards.

All suppliers are asked to accept our Modern Slavery and Anti-Bribery Statement or if a supply contract is negotiated to include appropriate provisions in that contract. In this way, we explain that we do not tolerate slavery or human trafficking and our suppliers are asked to confirm that this is the approach that they take in their business and in their supply chain.

5. Training

We invest in educating all our staff and our training helps them to recognise the risks of slavery and human trafficking in our business and supply chains. Our training programmes encourage employees to identify and report any potential breaches of our policies. Our training explains the benefits of tackling slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. Training is provided for new staff as part of our induction programme and is repeated at least every two years thereafter. Completion of training is monitored. Those individuals who deal directly with our suppliers receive additional support by reference to their role.

6. Further actions and sign-off

The size and nature of our business has grown considerably over recent years and we are proposing to review our supplier appointment processes generally.

In relation to slavery and human trafficking, we have reviewed our approach and have updated our policies and practices to make our position simpler and clearer so that it is easier for staff and suppliers to engage with our approach. We have reviewed and revised our supplier documentation to more clearly explain our position on slavery and human trafficking and the approach that we expect our suppliers to adopt. We will be reviewing and updating our internal guidance to support our approach to the appointment of suppliers.

We will continue to provide training to all members of staff.


We will continue to review our working practices in relation to slavery and human trafficking.

We will continue to respond to Modern Slavery Act information requests from our clients.

The Directors of Gateley (Holdings) Plc approved this statement on 6 July 2020.

The Directors of Gateley Plc approved this statement on 8 October 2020.

Signature:



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Nigel Payne, Chairman,
Gateley (Holdings) Plc

Date: 12/10/20

Signature:



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Neil Smith, Finance Director,
Gateley Plc

Date: 12/10/20