

DATED 24 May 2019

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**GATELEY (HOLDINGS) PLC**  
**ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**  
**Financial year ending 30 April 2019**

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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 2018 and ending 30 April 2019. This statement covers the activities of Gateley (Holdings) Plc and its wholly-owned subsidiaries, as follows: Gateley Plc, Entrust Limited, International Investment Services Limited, Kiddy & Partners Limited, Gateley Capitus Limited and Gateley Hamer Limited. References to "Gateley", "we", "us", "our" or the "company" are to Gateley (Holdings) Plc and the members of its 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 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 900 people, predominantly professionally qualified and highly skilled people, across 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/>.

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.

Due to the nature of the services we provide and the jurisdictions in which we provide those services, we consider the risk of slavery and human trafficking occurring within our business to be low.

As providers of legal and other professional services, we work with a range of suppliers who provide products and services to support our business ranging from office consumables, to technology, to other professional services. 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.

All references in this statement to policies and systems in place are relevant to all of the companies constituting the Gateley group.

3. **POLICIES**

As part of our commitment to combating slavery and human trafficking we have adopted a specific anti-slavery policy which has been approved by our Board of Directors.

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 UK.

Gateley evaluates the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its supply chain by assessing the risk relating to its suppliers. Factors that are considered when undertaking a risk assessment include the origin of manufacture and supply and the nature of, and location from which, services are provided. Depending upon the level of risk identified, we may undertake due diligence with our supplier or proposed supplier to enable us to assess the situation in more detail.

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. Those individuals who deal directly with our suppliers receive training by reference to their role.

6. **FURTHER ACTIONS AND SIGN-OFF**

During the last financial year we have reviewed our approach and are updating our policies and practices to make our position simpler and clearer so that it is easier for suppliers to engage with our approach.

Action which is being taken during the current financial year includes:

- continued training for members of staff responsible for purchasing;
- revision of supplier documentation; and
- ongoing coordination of our responses to Modern Slavery Act information requests from our clients.

The Directors of Gateley (Holdings) Plc approved this statement on 24 May 2019. The Directors of Gateley Plc approved this statement on May 2019

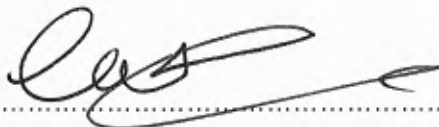
Signature:



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Director  
Gateley (Holdings) Plc

Date: 24 May 2019

Signature:



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Director  
Gateley Plc

Date: 24 May 2019