



Forward thinking
Straight talking

Modern Slavery Statement

RESPONSIBLE BUSINESS

Gateley /



Introduction

Our modern slavery statement has been produced in line with The Ethical Trading Initiative (ETI) framework. ETI is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe.

Gateley has a commitment to ethical trade and we adopt a labour policy - captured in our modern slavery statement and policy - which we expect our suppliers to adhere to.

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 2020 and ending 30 April 2021. 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, T-three Group Limited and Gateley Economic Growth 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 the companies constituting the Gateley.

The Directors of Gateley (Holdings) Plc approved this statement on 5 August 2021.
The Directors of Gateley Plc approved this statement on 28 July 2021.

Nigel Payne, Chairman
Gateley (Holdings) Plc
Date: 5 August 2021

Neil Smith, Finance Director
Gateley (Holdings) Plc
Date: 5 August 2021



Structure, business and supply chains

STRUCTURE
BUSINESS AND
SUPPLY CHAINS

POLICIES IN
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IDENTIFYING,
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RISKS IDENTIFIED

Structure

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, in England, Northern Ireland, Ireland and Dubai. To find out more about the nature of our business, please click gateleyplc.com/about-us/.

Business

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 referencing, 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.

Supply chains

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 suppliers include cleaning and catering, hospitality, IT equipment, software and consultancy, payroll, audit, counsel, office consumables such as stationery and office fit out and maintenance. Of these we consider the supply of hospitality services to be the area where there is a higher potential for modern slavery. With the exception of cleaning services, and on occasion catering, 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.

Policies

in relation to slavery and human trafficking

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 and to help staff achieve and maintain these standards. These include areas such as the appointment of suppliers and recruitment.

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.

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Identification

of risks together with steps taken to prevent and manage that risk

The ITUC Global Rights Index depicts the world's worst countries for workers by rating countries on a scale from 1 to 5+ on the degree of respect for workers' rights. Violations are recorded each year from April to March. We provide professional services from offices and to clients predominantly based in the United Kingdom. The United Kingdom secured a 3 rating on the ITUC Global Rights Index and consequently we do not consider that we operate in high risk sectors or locations.

However, 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 policies are developed, approved and implemented by the group's Operations Board.

Our procedures are designed to:

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

Due diligence processes

in relation to slavery and human trafficking in business and supply chains

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 confirm their acceptance of our approach to modern slavery or if a supply contract is negotiated we seek 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 they take the same approach in their business and in their supply chain.

We have taken the opportunity presented by the Coronavirus pandemic to review our approach to hospitality supplies. We are adopting different styles of hospitality and changes have been made to our processes relating to hospitality supplies including for example the creation of approved supplier lists and changes to our authorisation and payment processes.

In terms of monitoring working conditions across our operations and supply chains, our staff attend training which focuses on highlighting examples of slavery and human trafficking and spotting the signs of both. We do not currently engage with external organisations to help monitor working conditions across our operations and supply chains.

Effectiveness

in ensuring that slavery and human trafficking is not taking place in business or supply chains, measured against appropriate KPIs

The size and nature of our business continues to grow and we will continue to review our supplier processes alongside that growth.

Our policies and procedures are subject to regular review and where we identify opportunities to make our modern slavery and human trafficking policies and procedures and our supplier documentation more effective we will update them accordingly.

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.

Social audits

In May 2021, Gateley signed up to The Levelling Up Goals campaign which is run by This is Purpose. As part of our involvement with the campaign, we are working with This is Purpose to assess our business against 14 levelling up goals which set out clear objectives for the UK's Levelling Up challenge in the wake of Covid19. Working with This is Purpose, we have identified where we are strong as a business and what our ambitions are in terms of further levelling up so that our Group can be a force for good.

Grievance mechanisms

We encourage staff to raise any concerns that they have in relation to modern slavery. We have a robust whistleblowing policy which aims to ensure that our employees are confident that they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

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Training and capacity building

about slavery and human trafficking

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.

Training is delivered via an online webinar which all staff complete and refresh on a regular basis. The training raises awareness of where within their working life they may encounter people or situations that are more at risk of links with modern slavery, such as considering our supply chain or other external parties they come into contact with.

Our training programmes encourage employees to identify and report any potential breaches of our policies. Those individuals who deal directly with our suppliers receive additional support by reference to their role.

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Risks identified

during the period of the statement

We have not identified any priority risks during the period of the statement.

We have not found any International Labour Organization (ILO) indicators of forced labour.

As part of our Responsible Business strategy we are assessing progress over the next 12-months in line with the Levelling Up Goals; addressing modern slavery risks is being considered as part of this review.



gateleyplc.com

Gateley is the business name of Gateley (Holdings) Plc.