

Modern Slavery Act Statement

For the financial year end 31 July 2016

1. Introduction

This statement has been published in accordance with the requirements of **section 54(1) Modern Slavery Act 2015** (“the Act”). It sets out the steps taken by Marks & Clerk LLP (“Marks & Clerk”) during the financial year ended 31 July 2016 to ensure modern slavery and human trafficking is not taking place in any part of our business or any of our supply chains.

Marks & Clerk has a zero tolerance approach to modern slavery of any kind within the organisation and its supply chains.

Marks & Clerk has not detected and does not believe any incidences of modern slavery took place within the business or supply chain during the last financial year.

2. Structure

Marks & Clerk is one of the largest suppliers of intellectual property services within the UK, advising clients across the private and public sectors. Marks & Clerk is a limited liability partnership registered in England and Wales (registered number OC343273). As at 31 July 2016 Marks & Clerk had 56 members and over 350 employees. Marks & Clerk’s head office is based in London and has a further seven offices in Aberdeen, Birmingham, Cambridge, Edinburgh, Glasgow, Manchester and Oxford. For the financial year ended 31 July 2016 the annual turnover was £42m.

Marks & Clerk does not have any subsidiaries in the UK or overseas.

3. Slavery and human trafficking policies

Marks & Clerk is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Marks & Clerk is committed to acting ethically and with integrity in all our business processes and relationships. Marks & Clerk has implemented and enforces effective systems and controls to ensure slavery and human trafficking does not take place anywhere in our supply chains.

Marks & Clerk operates the following procedures that describe its approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing:** Marks & Clerk encourages all its workers, customers and other business partners to, without fear of retaliation, report any concerns related to modern slavery and human trafficking within its supply chains or direct activities. This includes any circumstances that may give rise to an

enhanced risk of slavery or human trafficking. Marks & Clerk supports openness about raising any concerns of human rights violations like modern slavery and staff are encouraged to report genuine concerns about wrongdoing or legal breaches.

- **Employee code of conduct:** Marks & Clerk makes clear to employees the actions and behaviour expected of them when representing the business. Marks & Clerk strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Recruitment/Agency workers policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

4. Due diligence - identifying, assessing and managing the risk of modern slavery and human trafficking

As a provider of intellectual property services the suppliers that support the operation of our business very broadly fall into the following general categories:

- counsel and experts;
- employee benefits;
- food and beverage;
- marketing and business development;
- telecommunications and information technology;
- utilities.

In the event of a situation, risk or allegation occurring, the matter will initially be reported to the Board of Management to determine appropriate action.

5. Key performance indicators

In order to assess the effectiveness of our modern slavery measures Marks & Clerk will specifically be focusing on internal communication, staff awareness training, staff induction processes.

6. Awareness and training

Marks & Clerk intends to raise awareness and understanding to ensure all staff can detect and observe the risks of human trafficking and slavery in our supply chain. By raising awareness all staff will be aware of their responsibility to be alert to the risks, however small, in the business and in the wider supply chain.

If requested additional modern slavery and human trafficking training will be made available.

7. Effectiveness

Marks & Clerk has not discovered or been informed of any incidents of modern slavery or human trafficking during the financial year, but would investigate any allegations should they arise and take appropriate action in accordance with our standards and procedures.

8. Future Steps

During the next financial year, Marks & Clerk will:

- continue to monitor and if necessary update any policies affected by the Act to reflect the continued commitment to implementing and enforcing effective practices and controls to ensure modern slavery is not taking place in our business and supply chains; and
- continue to review and monitor our procurement processes for new and existing suppliers. This may include categorising suppliers based on various risk factors (including modern slavery) and use this to shape future due diligence supply chain processes.

This statement is made in accordance with the **Modern Slavery Act 2015 section 54(1)** and constitutes our slavery and human trafficking statement for the financial year ending **31 July 2016**.

Signed by:

A handwritten signature in black ink, appearing to read 'David Ward', written in a cursive style.

David Ward

UK Managing Partner and Designated Member

Marks & Clerk LLP