

# Modern Slavery Act Statement

## For the financial year ending 31 July 2018

### 1. Introduction

This statement sets out the actions that Marks & Clerk LLP (“Marks & Clerk”) has taken to understand all potential modern slavery risks related to its business and the steps it has taken that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 August 2017 to 31 July 2018.

### 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, and is regulated by the Intellectual Property Regulation Board (IPReg). Marks & Clerk is a limited liability partnership registered in England and Wales (registered number OC343273). As at 31 July 2018 Marks & Clerk had 51 members and 337 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 ending 31 July 2018, the annual turnover was £75.5m.

Marks & Clerk is part of a group of affiliated partnerships and entities authorised to practice under the name “Marks & Clerk” but does not have any subsidiaries in the UK or overseas. The group currently operates in the UK, Luxembourg, France, Canada, China, Malaysia and Singapore. Whilst these non-UK offices are not subject to the Modern Slavery Act 2015 (“the Act”), the Marks & Clerk group demonstrates an ongoing commitment to the ethical treatment of people globally.

### 3. Slavery and human trafficking policies

Marks & Clerk is committed to acting ethically and ensuring that modern slavery and human trafficking does not take place anywhere within our business and that our supply chains are free from such activity. We have a culture of respect for individuals in which slavery and human trafficking has no place.

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:** The prevention, detection and reporting of modern slavery in all areas of our business is the responsibility of all those working for us. Whilst our culture is such that we encourage staff to raise concerns openly, we also have a formal policy in place which is designed to make it easy for staff to make disclosures.
- **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:** Where required 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 an international intellectual property services firm our key assets are our people and our work product is intellectual property services. The nature of our business means that our supply chains are relatively limited in number and short, therefore the risk of modern slavery within our business is low.

#### 5. Effectiveness

Marks & Clerk is aware of the legal requirements of the Act. For the financial year 2017/18, the business took the necessary steps to ensure compliance and has no reason to suspect that practices of slavery and/or human trafficking are taking place in any part of the business or supply chain.

#### 6. 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;
- develop our procurement policy to ensure suppliers, contractors and business partners are required to demonstrate they comply with the provisions of the Act;

- work with our international offices to put in place similar policies and procedures to prevent Modern Slavery and Human Trafficking; and
- educate staff to prevent Modern Slavery and Human Trafficking within the organisation and provide training to enhance our firm's knowledge and understanding of the requirements under the Act and to ensure that we know how to identify areas of concerns and how to deal with them.

This statement, which will be reviewed and updated annually, was approved by the Board of Marks & Clerk LLP on 31 January 2019.

**Signed by:**



**Simon Mounteney**  
**UK Managing Partner**  
**Marks & Clerk LLP**

The Modern Slavery Act 2015 is an act to make provision about slavery, servitude and forced or compulsory labour and human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-slavery Commissioner; and for connected purposes