



Modern Slavery and Human Trafficking Statement

For the year ending 31 December 2019

Purpose and scope of this statement

This statement is made on behalf of Chase de Vere IFA Group Plc (“Chase de Vere”) pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”), and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2019.

We have a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

We are fully committed to ensuring there is transparency in our business and in our approach to tackling modern slavery and human trafficking in our supply chains.

Our Business

In the increasingly complex UK financial services market we are known as experts in our field. We have been a trusted source of independent financial advice for 50 years, which makes us one of the UK's longest established practitioners.

Backed by Swiss Life, one of Europe's largest personal finance groups, we are well placed for the longer term and able to exercise our position and influence in the market for the benefit of our clients. We act for individuals as well as companies and their employees, all of whom are seeking to prosper financially from our tailored financial advice.

We believe in giving holistic advice that complements our clients' personal financial goals. We do this by first getting to know our clients and their objectives and then offering them solutions that work towards their goals.

As independent financial advisers we are free to choose products from the entire UK financial services market. This means our clients can be sure that whatever advice and solutions we offer; we offer them with complete impartiality as we are not beholden to any given product provider. Any products we put forward we will have chosen for their value for money and their suitability for our clients' individual circumstances. We believe this is the only route to ‘best value’ appropriate advice.

We have offices throughout the UK and pride ourselves on delivering all the capabilities you would expect from a large national organisation at a local personalised level.

Our Suppliers

As financial services providers, our supply chains are relatively straightforward compared with other sectors in the UK and the majority of the providers of services and goods we use are based in the UK.

Within the financial services sector, although the risk of modern slavery or trafficking taking place in our supply chain is low, we understand the importance of combatting slavery, human trafficking, servitude and forced labour.

We expect our suppliers and contractors to demonstrate a zero tolerance approach to exploitation. To this end, all new contracts and those renewing, continue to include a clause requiring that our suppliers, and their subcontractors, comply with the Act, and include Chase de Vere's right to terminate in the instance of any breach of this obligation.

As part of our procurement process, we will only engage with suppliers and contractors who confirm their compliance with the Act. Although we consider our exposure to modern slavery to be limited, nevertheless we seek their confirmation of compliance with the Act. Furthermore, we undertake risk assessments of our suppliers across the entire organisation and will ask for specific assurances from those suppliers carrying the highest exposure to risk.

Our Policies

We expect all colleagues to be treated fairly, with respect and dignity, regardless of whether they are employed directly or through a third party or supplier.

To support this, we operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Recruitment policy - we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy - we operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Safety and Well Being of Staff - this policy sets out the safety of colleagues while dealing with our clients.
- Code of Conduct – In line with and to underpin our values, we adhere to the Swiss Life Group 'Code of Conduct'. The code offers guidance for our interactions with each other and with all persons outside of Swiss Life with whom we come into contact. The code expands on how the principles are practically incorporated into our day to day work lives.

Training & Building Awareness

We will continue to conduct training for our colleagues involved in procurement and tender processes so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

- We have rolled out mandatory training to all colleagues across the business to ensure that they understand the risks of modern slavery and human trafficking in our supply chains. This training enables our existing people to understand and spot the signs of modern slavery and human trafficking.
- Mandatory modern slavery and human trafficking training also forms part of the induction process for all new starters who join the business.
- Colleagues are encouraged and expected to report any suspicious activity through the appropriate channels or via our whistleblowing policy.

Effectiveness of Measures

As at the date of this statement we have had no reports of modern slavery or human trafficking in any part of our business or supply chain.

We have and will continue to review suppliers' modern slavery policies and procedures during the contract renewal and also as part of the approval process for new suppliers.

We will continue to review these to ensure that the measures that we have in place are, and remain, effective.

Approval for this statement

This statement has been approved by the Board of Directors.

A handwritten signature in blue ink, appearing to read 'Gavin Chapman', is positioned above the printed name and title.

Gavin Chapman
Director – Legal & Regulatory