Modern Slavery and Human Trafficking Statement

INTRODUCTION FROM THE FINANCE DIRECTOR

This statement sets out The William Pears Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.
The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.
The organisation is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

OUR BUSINESS

The Group carries on the business of lending, property investment and dealing of both residential and commercial property; and fund management and equity investment. The group principally operates in the UK and has a turnover of £75m. The group demonstrates social responsibility through contributions to the Pears Foundation www.pearsfoundation.org.uk .

OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
A number of policies designed to reflect our commitment to responsible, sustainable and ethical business are already in place in our business and accessible through the staff intranet. These include, but are not limited to:

- Employment policies that include matters relating to diversity and equal opportunities;
- Whistle-blowing;
- Hospitality, Gifts and Services;
- Anti-Bribery.

Our Anti-slavery policy will be fully rolled out across our wider business to enhance the policy framework within the group.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

It is our belief that modern slavery and human trafficking are abhorrent practices that will not be tolerated in our own operations or in our supply chains, and we will take such steps that are reasonable to ensure than none is present. We are committed to working ethically and with integrity and we require our business partners to do the same.

Whist vigilant that we could be at risk of slavery or human trafficking within our own business, we believe the greatest risk is within our supply chains. We have identified the following areas as carrying the greatest risk:

- Construction and building maintenance related activities
- Cleaning services
- Security services
- Joint venture partners

Suppliers will be risk assessed and categorised taking into account the nature of their business as well as country of operation, and product and industry characteristics. Suppliers categorised as presenting significant risk of modern slavery will be subject to additional due diligence, primarily based on public sources of information including checks of their own modern slavery and human trafficking statements where applicable, and any other published policies and procedures. Where, following additional due diligence and checks, a supplier is still assessed as presenting a significant risk of modern slavery or failing to meet our standards, they will be required to complete a modern slavery questionnaire. The quality and transparency of responses to these questionnaires will be assessed.

OUR SUPPLIERS AHERENCE TO OUR VALUES

The identification and prevention of modern slavery is critical when hiring staff and when making procurement decisions such as appointing suppliers and contractors. We encourage our suppliers to uphold the same standards as we apply to ourselves and we seek to partner with suppliers that adopt the same strict standards that we ourselves adhere to. We expect our suppliers to operate fair and ethical workplaces, where workers are treated with dignity and respect, and the highest standards of human rights are upheld.

In the event that we become aware of a case of Modern Slavery occurring within our supply chain, we will work with the supplier to implement remedial action. In all cases consideration will be given to the approach that produces the safest outcome for potential victims of Modern Slavery. We expect our suppliers to engage with us constructively and responsibly, and to demonstrate their willingness to remedy issues in a timely manner. We reserve the right to refuse to partner with suppliers that do not achieve or are unable to demonstrate progress towards the eradication of Modern Slavery within their organisations and supply chains.

TRAINING

Raising awareness amongst relevant members of our organisation, specifically those who operate in procurement, risk, corporate responsibility and human resources functions and will ensure that our people have the skills and knowledge they need to be able to flag potential issues. In 2019 we will continue to promote wider awareness and understanding of Modern Slavery to staff and our suppliers and the requirements of the Modern Slavery Act will form part of our 2019 training programme. We will continue to develop a staff awareness strategy for the Modern Slavery Act 2015 and reporting mechanisms if a case of slavery or human trafficking is suspected.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we are to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

We use the following to monitor the effectiveness of our policy.

1. Number of reports received from employees.
2. Number of approaches from the public.
3. Reports by law enforcement agencies to indicate that modern slavery practices have been identified.
4. Employee engagement.

FURTHER STEPS AND OUR INTENTIONS

We understand that Modern Slavery risk is not static, and will continue to review our processes to mitigate this risk in the year ahead. This will include a review of our procurement process looking at additional measures to ensure that our obligations under the Act are passed through our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Group's slavery and human trafficking statement for the financial year ending 30th April 2019.

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Elliot Goldfarb
Finance Director
The William Pears Group
Date: 29 March 2019