Slavery and Human Trafficking Statement

This statement comprises the Slavery and Human Trafficking statement of Charles Stanley Group PLC ("Charles Stanley", "the Company" or "CSG") for the financial year ending 31 March 2018. Charles Stanley is required to make this statement pursuant to section 54(1) of the Modern Slavery Act 2015 ("MSA"). The Statement was approved by the CSG Board on 26 September 2018.

The Business:

Charles Stanley provides a range of wealth management services within the UK to both private and institutional clients. Given the nature of Charles Stanley's operations, Charles Stanley is at very low risk of exposure to Slavery and Human Trafficking issues.

Supply Chains:

Charles Stanley does not act as a producer, manufacturer, or retailer of any physical goods and, as a financial services provider, it has a relatively straightforward supply chain. It conducts very little business outside the UK, and has limited connections with overseas suppliers.

Policies in relation to Slavery and Human Trafficking:

Charles Stanley recognises its role in seeking assurance from suppliers of their compliance with Slavery and Human Trafficking laws, while recognising that ultimately this is those suppliers' responsibility.

The Staff Handbook states the Company has a zero tolerance to Slavery and Human Trafficking and places a duty on all staff to report any potential infringement arising either internally or externally. Detailed background checks are carried out by an independent firm prior to new employees commencing work with Charles Stanley which incorporate protections which should allow for the discovery of any human rights abuses and to ensure that Charles Stanley does not participate in any human trafficking practices.

Charles Stanley also has various practices, procedures and policies to ensure compliance with all human rights laws and UK employment laws. Key policies include:

- Equal Opportunities Policy
- Whistleblowing Policy
Charles Stanley has also committed to pay its staff not less than the current Living Wage (which exceeds the UK’s national minimum wage).

**Actions Taken and Planned:**

Throughout the 2017/18 financial year the Group’s activities have been confined to the assessment and consideration of the implications of the MSA on the business and have continued the initial plans of the relevant changes to its existing procedures to address identified issues. These have included:

- **Due diligence processes:** As a Slavery and Human Trafficking concerns are of a low risk to the business, Charles Stanley assesses and reviews such matters with existing contractual suppliers as and when contracts are renewed, and at inception with any new supplier. This also includes where appropriate the insertion of provisions into written contracts which oblige suppliers to comply with the MSA and hold them to the same standards as Charles Stanley applies to its own business in this regard. If, after enquiry, any organisation within its supply chain is unable to demonstrate their commitment to their obligations after enquiry, they will not be taken on as a supplier or their services will be terminated. During the 2017/18 review process, no contracts were terminated.

- **Training:** Throughout 2017/18, the annual compulsory training for all staff in the business has been developed to include Slavery and Human Trafficking to further ensure all staff are aware of all their rights and obligations. This training is included in the new joiner induction which is a requirement for all new, part and full time staff and plans to be refreshed for all existing staff during 2018/19.

- **During the year Charles Stanley set up a free and confidential helpline available to all employees.**

- **The Procurement Policy underwent an annual review which includes a requirement for significant suppliers to confirm their compliance with the MSA.**

- **Ongoing developments to Charles Stanley’s significant supplier due diligence process and the ongoing review of their contracts are scheduled to continue during 2019.**

Signed for and on behalf of the CSG Board by:

Paul Abberley

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[i] For certain suppliers below procurement thresholds where there is no formal contract the Group will make best efforts to ensure that the supplier is compliant with the Act.
Investors should be aware that past performance is not a reliable indicator of future results and that the price of shares and other investments, and the income derived from them, may fall as well as rise and the amount realised may be less than the original sum invested.

Charles Stanley & Co. Limited is authorised and regulated by the Financial Conduct Authority and is a member of the London Stock Exchange.