

Anti-slavery and human trafficking Policy

April 2019

1. Introduction

The aim of this Policy is to inform employees and others about the issues around exploitation of people and what HGF does to meet its obligations in the UK under the Modern Slavery Act 2015.

This policy applies to all companies within the HGF Group, which includes HGF Business Services Limited (UK), HGF Limited (UK), HGF Law LLP (UK), HGF BV (the Netherlands), HGF GmbH (Switzerland), HGF IP Limited (Ireland) and HGF Europe LLP (Germany, Austria and UK) (hereinafter referred to as HGF, “we”, “us”, “our”, “firm”). We will apply this Policy in all locations in which we operate.

2. What is slavery?

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all four activities.

3. How is it relevant to us?

Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, it may seem that this whole subject is irrelevant to us, but it is not.

At a very basic level, preventing exploitation and human trafficking, and protecting our workforce and reputation, makes good business sense. The MSA 2015 recognises the important part that businesses can and should play in tackling slavery. It encourages them to do more.

With this in mind, HGF needs to pay particularly close attention to:

- our supply chain
- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- cleaning and catering suppliers
- corporate hospitality
- overseas travel

4. Responsibilities

The firm, our managers and colleagues, all have responsibilities to ensure that fellow workers are safe-guarded, treated fairly and with dignity. The Director of Professional Practice is responsible in HGF for this policy. Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

The **firm** will:

- maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- be clear about our recruitment policy (see Recruitment)
- review our supply chains (see Supply chains)
- lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- ensure we have in place an open and transparent grievance process for all staff
- seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- make a clear statement that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement)

Managers of the firm will:

- listen and be approachable to colleagues
- respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
- remain alert to indicators of slavery (see Identifying slavery)
- raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- use their experience and professional judgement to gauge situations

Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- tell us if you think there is more we can do to prevent people from being exploited

5. The risks

Whilst, given the nature of our business and client profile, we consider our risk profile to be small, the principal areas of risk we face, related to slavery and human trafficking, include:

- overseas associates in some countries
- recruitment through agencies
- our use of external cleaners and caterers

We manage these risk areas through our procedures set out in this policy and elsewhere.

6. Our procedures

Anti-slavery statement

We make a clear annual statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously. We make this statement on our website. The statement:

- Says what we do in the IP world and what risks we face with regard to slavery and human trafficking
- Commits to treating our staff fairly and paying above the Living Wage
- Points out the actions we take to comply with the legislation

This policy sets out the key risk areas we face and our approach to avoiding and preventing modern slavery.

Supply chains

Although in our business the risk of slavery and human trafficking being a factor is minimal, nevertheless we review our supply chains to ensure the potential for slavery and human trafficking is reduced.

We tell the companies we do business with that we are not prepared to accept any form of exploitation.

Our Terms and Conditions of Business contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking if they want to do business with us. We have corresponding Terms of Instruction which we employ when asking third parties to act for us, or on behalf of our clients.

Recruitment – General

- We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- We always ensure staff are legally able to work in the UK.
- We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, we will follow our reporting procedures (See Reporting slavery).

Recruitment – Using agencies

- Our HR department follows firm policy and only uses agreed specified reputable recruitment agencies.
- To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:
 - conducting background checks
 - investigating reputation
 - ensuring the staff it provides have the appropriate paperwork (eg work visas)
 - as appropriate, ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
- We keep agents on the list under regular review.

7. Identifying slavery

There is no typical victim and some victims do not understand that they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim.

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often one builds up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it.

8. Reporting slavery

Talking to someone about your concerns may stop someone else from being exploited or abused. If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with the HR Director who will decide a course of action and provide any further advice.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns with the HR Director first before taking any further action.

9. Training

We provide training to those staff members who are involved in managing recruitment and our supply chains. Because the risks are deemed slight in our business, we do not provide specific training to identify slavery to any of our staff.

10. Monitoring our procedures

We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

HGF Board
4 April 2019