

Link Market Services Limited

Prevention of Modern Slavery Statement

1 January to 30 June 2019



Contents

1.	Purpose	3
2.	Scope	3
3.	Policy Statement	3

1. Purpose

- 1.1 The purpose of this statement is to specify details of Link Corporate Market approach to fulfilling its commitment to support the elimination of Modern Slavery and fully meet its obligations under the Modern Slavery Act 2015. This Statement relates to actions and activities for the year ended 30 June 2019.

2. Scope

- 2.1 This statement applies to Link Market Services Limited.
- 2.2 Link Market Services offer industry-leading shareholder services to a wide range of corporates, issuers and business managers in the United Kingdom.

3. Statement

- 3.1 Link Market Services is committed to preventing acts of modern slavery and human trafficking in our business and supply chain. This commitment is embedded in our corporate values, our people processes and our supply chain governance practices. Together, these help make it a reality that everyone who works for Link Market Services, in any capacity, and anywhere, benefits from a working environment in which their fundamental rights and freedom are respected. This is also underpinned by a detailed framework of policies and procedures in place including our Ethical Code, Anti-Bribery and Corruption, Human Rights, Speak Up, Open Door, Procurement and Supplier policies and standards. These collectively set out how we do business, engage with clients and manage our relationships with end customers, suppliers and third parties.
- 3.2 We acknowledge the Modern Slavery Act 2015 (the Act) and within our remit, we encourage others to support the following international standards and as such ask third parties who represent us and suppliers who provide goods and/or services to us, to confirm their commitment alongside our commitment to the:
- UN Declaration of Human Rights
 - UN Guiding Principles on Business and Human Rights, and
 - Core Conventions of the International Labour Organisation.

Business structure

- 3.3 The risk framework is embedded across the organisation and drives understanding and action on strategic risk and compliance controls and issues that include Corporate Responsibility, Human Rights, Modern Slavery and Human Trafficking.
- 3.4 We are committed to conducting our procurement activities in a manner that support Link Market Services to prevent acts of modern slavery and human trafficking by:
- requiring suppliers to meet Link Market Services ethical standards, security requirements, environmental, corporate responsibility, equality and diversity objectives, and complying with relevant legislation, best practice and Link Market Services Policies
 - assessing suppliers to ensure that they are fit for purpose and sustainable.

Our supply chain

- 3.5 We consider third parties who represent us and suppliers who provide goods and/or services as an extension of our business. That is why we work collaboratively with them to ensure they act in a way that is consistent with our ethical code commitments and our policies.
- 3.6 As a professional services firm, our suppliers mainly range from suppliers delivering services in our offices (such as security, maintenance, cleaning and catering) to IT and other professional service providers engaged to support our business (e.g. telecommunication suppliers, IT maintenance and software providers and professional advisory services).
- 3.7 We see our supply chain as a principal risk within our business and it is principally managed by Procurement and local procurement teams across the business. Our analysis, based on the UN Guiding Principles Reporting Framework, suggests the likelihood of any infringements in our supply chain is limited as the severity and frequency of infringements is higher in the procurement of goods rather than services which represents the majority of our supply chain.
- 3.8 Given the robust UK legislative framework the risk of infringement for our employees and supplier employees working in our UK offices is low. Nevertheless, we recognise our responsibility to identify and address potential infringements linked to the goods and/or services we procure. Therefore, we have put in place procedures to work to ensure that our suppliers adhere to the same standards as we apply to ourselves. Our approach has been to focus on our largest direct suppliers, followed by the next tier and then indirect suppliers.
- 3.9 Our Procurement team uses an assessment and benchmarking tool, to audit those suppliers with whom we spend over £1M, or who are deemed a potential material risk in the supply chain of products or services, regardless of size. This tool assesses our suppliers' labour practices including human rights, fair business practices, health & safety, environmental performance and compliance with the Modern Slavery Act.
- 3.10 For those suppliers, outside of this group they will be audited through the robust due diligence process run internally. All new suppliers are subject to this due diligence assessment as part of our on-boarding process to ensure their suitability as a supplier.

Training

- 3.11 Management and supply chain leadership awareness has been raised through the implementation of our Prevention of Modern Slavery Policy and associated divisional attestation process. We are continually evaluating employee awareness and required training as part of the implementation of our Procurement Policy and Standards.

Conclusion

- 3.12 Whilst we consider the markets and sectors we operate in and nature of services and products supplied to us as having a low risk exposure to acts of modern slavery we remain committed, diligent and aware of the consequence these acts have on the lives of the individuals impacted.

Board approvals

This statement is made pursuant to section 54(1) of the Act, has been approved by the Board of Directors of Link Market Services Limited and will be updated annually in line with the Act's reporting requirements.

Chief Executive Officer's Name: Susan Ring

A handwritten signature in black ink, appearing to read 'S Ring', with a small mark above the 'i'.

Chief Executive Officer's signature

Date: 9th June 2020