



## Transparency Statement (June 2018)

This is the statement of steps that each of N M Rothschild & Sons Limited and Rothschild Wealth Management (UK) Limited (together, “Rothschild & Co”) has taken to ensure that slavery and human trafficking are not taking place in our business or in our supply chains. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes our Modern Slavery Act Transparency Statement for the financial year ending 31 December 2017.

Rothschild & Co, as one of the world’s largest independent financial advisory groups, is rightly held to high standards of ethics and integrity in all that we do. We approach our business with a deeply-held sense of responsibility to our people, to our environment and to the communities in which we operate.

Rothschild & Co has performed a risk assessment on (1) its current staff profile and recruitment practices (covering employees, contractors and agency staff) and (2) its supply chain (with a focus on tier-one suppliers i.e. those with which we contract directly). In this risk assessment we looked at the potential for vulnerabilities in relation to slavery and human trafficking, considering the probability of such risks materialising, the impact of them doing so, and the control mechanisms we have in place that attempt to mitigate such risks.

### Staff profile and recruitment practices

We have rigorous HR policies and practices which are in line with our obligations pursuant to the Act; background checking procedures are thorough and apply equally to permanent employees as to contractors. We have not found any evidence to suggest that modern slavery is present within our business. Although we have assessed that we have minimal risk in this respect, we remain alert to possible risks of modern slavery and we will continue to adhere by our stringent HR standards.

### Supply chain

We have in recent years developed a methodology for classifying our tier-one suppliers; we look at the risks evident in both (1) the *sector* in which they operate and (2) the *jurisdiction* in which they are incorporated or where they principally work. On the latter point we are guided by the [Global Slavery Index](#) which has determined the list of countries where slavery is most widespread, as a proportion of the population.

On this basis, we then classify suppliers as:

- **low risk** (neither a high risk sector nor a high risk jurisdiction);
- **medium risk** (either a high risk sector or a high risk jurisdiction); or
- **high risk** (both a high risk sector and a high risk jurisdiction)

For the financial year ending 31 December 2017, we have reviewed our top 200 tier-one suppliers to Rothschild & Co (listed by expenditure). The results of our due diligence found that, within this group of 200: 186 tier-one suppliers were low risk, 14 tier-one suppliers were medium risk and there were no high risk tier-one suppliers. In addition to this, we also reviewed our list of ‘favoured hotels’ (the hotel & leisure industry is a high risk sector and we could see clearly when any ‘favoured hotel’ was in a high risk jurisdiction). Of these 169 ‘favoured hotels’, 10 were classified as high risk.



As a response to this we have written to those high risk 'favoured hotels', appending our Anti-Slavery Policy and asking that they confirm that they will adhere to its terms. The Anti-Slavery Policy requires that the supplier receiving the same:

- has a zero-tolerance approach to modern slavery within their organisation and their supply chain;
- has a policy of preventing, detecting and reporting modern slavery in any part of their organisation or their supply chain;
- does not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of the Anti-Slavery Policy; and
- requests that those within their own supply chain adhere to the same standards set out in the Anti-Slavery Policy.

If the high risk 'favoured hotels' do not so adhere to the Anti-Slavery Policy then they will be removed from our list of 'favoured hotels' for the UK. We have also implemented a procedure whereby prospective bookings to hotels in high risk jurisdictions not falling within our list of 'favoured hotels' are flagged to the Security and Legal teams who will either require that the chosen hotel adheres to the Anti-Slavery Policy or advise that a different hotel from the 'favoured hotel' list is selected.

With medium risk tier-one suppliers, when contracts are reviewed we implement a variety of measures depending on the level of risk presented, including (1) asking that the supplier represents and warrants that they comply with the Act (to the extent applicable) and other anti-slavery legislation, (2) requesting that the supplier will adhere to our Anti-Slavery Policy, and (3) specifying the level of background checks we want performed on staff working on our contracts.

The risk assessment we have completed will be repeated in each financial year in order to ensure that our internal and external processes continue to be held to high and exacting standards.

**Director**  
**N M Rothschild & Sons Limited**  
**June 2018**

**Director**  
**Rothschild Wealth Management (UK) Limited**  
**June 2018**