



## ***Modern Slavery Act Transparency Statement (September 2017)***

This is the statement of steps that N M Rothschild & Sons Limited (“Rothschild”) 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 March 2017.

Rothschild is part of the Rothschild & Co group which, 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. Our approach to business is a deeply-held sense of responsibility to our people, to our environment and to the communities in which we operate. Although the impact of the Act predominantly vests within Rothschild, the initiatives taken in response to the Act are built on a common set of values on which the Rothschild & Co group’s internal operations, relations with stakeholders and investment decisions are based.

Following the publication of our slavery and human trafficking statement for the financial year ending 31 March 2016, Rothschild re-assessed (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). 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 are at low 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***

Our first tier suppliers were categorised by the risk evident in the *sectors* and the *jurisdictions* in which they operate.

- We reviewed our previously compiled list of high risk sectors where slavery and human trafficking are considered to be particularly prevalent
- We also referred to the [Global Slavery Index](#) to determine the list of countries where slavery is most widespread, as a proportion of the population

The composite parts of this double-headed approach of *sector* and *jurisdiction* will be reviewed annually to ensure our methodology remains relevant and robust.

Using these two concepts of sector and jurisdiction we accorded our suppliers the appropriate rating on the following basis:

- Low risk supplier: a supplier that is BOTH (i) working in a sector which is considered to be low risk, AND (ii) incorporated in (and predominantly operating within) a jurisdiction which is low risk



- Medium risk supplier: a supplier that is EITHER (i) working in a sector which is considered to be high risk, OR (ii) incorporated in (or predominantly operating within) a jurisdiction which is high risk
- High risk supplier: a supplier that is BOTH (i) working in a sector which is considered to be high risk, AND incorporated in (or predominantly operating within) a jurisdiction which is high risk.

The results of our due diligence found that the vast majority of our first tier suppliers were low risk. Additionally we have some medium risk suppliers and a very small number of high risk suppliers. As a response to this, in contracts with suppliers 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, (3) specifying the level of background checks we want performed on staff working on our contracts, and (4) requesting that certain high risk suppliers submit an annual slavery and human trafficking report setting out the steps it has taken to ensure that slavery and human trafficking are not taking place in any part of our business.

The risk assessment we 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.

We are committed to rooting out instances of abuse in our business and supply chains and re-affirm our zero-tolerance approach to slavery and human trafficking.

**Jonathan Westcott**  
**Director**  
**N M Rothschild & Sons Limited**  
**September 2017**