

Modern Slavery Act Statement

For the financial year ending 31 July 2019

Introduction

This statement is made pursuant to the Modern Slavery Act 2015 ("the Act") and sets out the actions that Marks & Clerk LLP ("Marks & Clerk") has taken to combat modern slavery and the steps it has taken to ensure there is no slavery or human trafficking in its own business, including its supply chains. This statement relates to actions and activities during the financial year 1 August 2018 to 31 July 2019.

1. Structure & supply chains

Marks & Clerk is one of the largest suppliers of intellectual property services within the UK, advising clients across the private and public sectors, and is regulated by the Intellectual Property Regulation Board (IPReg). Marks & Clerk is a limited liability partnership registered in England and Wales (registered number OC343273). As at 31 July 2019 Marks & Clerk had 54 members and 348 employees. Marks & Clerk's head office is based in London and has a further seven offices in Aberdeen, Birmingham, Cambridge, Edinburgh, Glasgow, Manchester and Oxford. For the financial year ending 31 July 2019, the turnover was £73.5m.

Marks & Clerk is part of a group of affiliated partnerships and entities authorised to practice under the name "Marks & Clerk" but does not have any subsidiaries in the UK or overseas. The group currently operates in the UK, Luxembourg, France, Canada, China, Malaysia and Singapore. These non-UK offices are not subject to the Act. Whilst we do not have control over how these affiliated partnerships or entities manage their own suppliers, all affiliated partnerships operate according to shared professional standards. These standards are based on our shared values, reflecting our core belief that ethics and integrity are fundamental and non-negotiable elements of our business. As an international intellectual property services firm our key assets are our people.

The nature of our business means that our supply chains are limited in number and short, therefore the risk of modern slavery is low.

2. The prevention of slavery and human trafficking policies

Marks & Clerk is committed to acting ethically and ensuring that modern slavery and human trafficking does not take place anywhere within our business and that our supply chains are free from such activity. We have a culture of respect for individuals in which slavery and human trafficking has no place.

Marks & Clerk operates the following procedures that describe its approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing:** The prevention, detection and reporting of modern slavery in all areas of our business is the responsibility of all those working for us. Whilst our culture is such that we encourage staff to raise concerns openly, we also have a formal policy in place, which is designed to make it easy for staff to make disclosures without fear of retaliation.
- **Employee code of conduct:** Marks & Clerk makes clear to employees the actions and behaviour expected of them when representing the business. Marks & Clerk strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Recruitment/Agency workers policy:** Where required the organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

3. Action taken to address Modern Slavery

For the financial year 2018/19, Marks & Clerk took appropriate steps to ensure compliance and has no reason to suspect that practices of slavery and/or human trafficking are taking place in any part of the business or supply chain.

4. Future focus

During the next financial year, Marks & Clerk will:

- consider a more thorough risk assessment process;
- continue to develop our procurement policy, which may include ensuring suppliers, contractors and business partners are required to demonstrate they comply with our suppliers' code of conduct and the provisions of the Act, the due diligence required when considering taking on new suppliers and the review of its existing suppliers;

- provide the necessary training for employees and Partners with procurement responsibilities on how to implement our procurement policy; and
- update our policies to include an annual confirmation that the policies in place relevant to the act are read and the values adhered to.

This statement, which will be reviewed and updated annually, was approved by the Board of Marks & Clerk LLP on 13 March 2020.

Signed by:

A handwritten signature in brown ink, appearing to read 'Simon Mounteney', with a long horizontal flourish extending to the right.

**Simon Mounteney
UK Managing Partner
Marks & Clerk LLP**

Our Modern Slavery Statement has been published in accordance with section 54(1) of the Act. It sets out the steps the LLP and affiliated partnerships and entities are taking to ensure slavery and human trafficking are not taking place in its supply chains or in any part of its business. The statement applies to the financial year ending 31 July 2019.

Modern Slavery Act Statement

For the financial year ending 31 July 2018

1. Introduction

This statement sets out the actions that Marks & Clerk LLP (“Marks & Clerk”) has taken to understand all potential modern slavery risks related to its business and the steps it has taken that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 August 2017 to 31 July 2018.

2. Structure

Marks & Clerk is one of the largest suppliers of intellectual property services within the UK, advising clients across the private and public sectors, and is regulated by the Intellectual Property Regulation Board (IPReg). Marks & Clerk is a limited liability partnership registered in England and Wales (registered number OC343273). As at 31 July 2018 Marks & Clerk had 51 members and 337 employees. Marks & Clerk’s head office is based in London and has a further seven offices in Aberdeen, Birmingham, Cambridge, Edinburgh, Glasgow, Manchester and Oxford. For the financial year ending 31 July 2018, the annual turnover was £75.5m.

Marks & Clerk is part of a group of affiliated partnerships and entities authorised to practice under the name “Marks & Clerk” but does not have any subsidiaries in the UK or overseas. The group currently operates in the UK, Luxembourg, France, Canada, China, Malaysia and Singapore. Whilst these non-UK offices are not subject to the Modern Slavery Act 2015 (“the Act”), the Marks & Clerk group demonstrates an ongoing commitment to the ethical treatment of people globally.

3. Slavery and human trafficking policies

Marks & Clerk is committed to acting ethically and ensuring that modern slavery and human trafficking does not take place anywhere within our business and that our supply chains are free from such activity. We have a culture of respect for individuals in which slavery and human trafficking has no place.

Marks & Clerk operates the following procedures that describe its approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing:** The prevention, detection and reporting of modern slavery in all areas of our business is the responsibility of all those working for us. Whilst our culture is such that we encourage staff to raise concerns openly, we also have a formal policy in place which is designed to make it easy for staff to make disclosures.
- **Employee code of conduct:** Marks & Clerk makes clear to employees the actions and behaviour expected of them when representing the business. Marks & Clerk strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Recruitment/Agency workers policy:** Where required the organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

4. Due diligence - identifying, assessing and managing the risk of modern slavery and human trafficking

As an international intellectual property services firm our key assets are our people and our work product is intellectual property services. The nature of our business means that our supply chains are relatively limited in number and short, therefore the risk of modern slavery within our business is low.

5. Effectiveness

Marks & Clerk is aware of the legal requirements of the Act. For the financial year 2017/18, the business took the necessary steps to ensure compliance and has no reason to suspect that practices of slavery and/or human trafficking are taking place in any part of the business or supply chain.

6. Future Steps

During the next financial year, Marks & Clerk will continue to:

- monitor and if necessary update any policies affected by the Act to reflect the continued commitment to implementing and enforcing effective practices and controls to ensure modern slavery is not taking place in our business and supply chains;
- develop our procurement policy to ensure suppliers, contractors and business partners are required to demonstrate they comply with the provisions of the Act;

- work with our international offices to put in place similar policies and procedures to prevent Modern Slavery and Human Trafficking; and
- educate staff to prevent Modern Slavery and Human Trafficking within the organisation and provide training to enhance our firm's knowledge and understanding of the requirements under the Act and to ensure that we know how to identify areas of concerns and how to deal with them.

This statement, which will be reviewed and updated annually, was approved by the Board of Marks & Clerk LLP on 31 January 2019.

Signed by:



Simon Mounteney
UK Managing Partner
Marks & Clerk LLP

The Modern Slavery Act 2015 is an act to make provision about slavery, servitude and forced or compulsory labour and human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-slavery Commissioner; and for connected purposes

Modern Slavery Act Statement

For the financial year end 31st July 2017

1. Introduction

This statement is made in accordance with the requirements of **section 54(1) Modern Slavery Act 2015** (“the Act”) and constitutes our slavery and human trafficking statement for the financial year ending **31 July 2017** and sets out the steps taken by Marks & Clerk LLP (“Marks & Clerk”) to ensure modern slavery and human trafficking is not taking place in any part of our business or any of our supply chains.

Marks & Clerk has a zero tolerance approach to modern slavery of any kind within the organisation and its supply chains.

Marks & Clerk has not detected and does not believe any incidences of modern slavery took place within the business or supply chain during the last financial year.

2. Structure

Marks & Clerk is one of the largest suppliers of intellectual property services within the UK, advising clients across the private and public sectors. Marks & Clerk is a limited liability partnership registered in England and Wales (registered number OC343273). As at 31 July 2017 Marks & Clerk had 54 members and over 350 employees. Marks & Clerk’s head office is based in London and has a further seven offices in Aberdeen, Birmingham, Cambridge, Edinburgh, Glasgow, Manchester and Oxford. For the financial year ended 31 July 2017 the annual turnover was £42m.

Marks & Clerk does not have any subsidiaries in the UK or overseas.

3. Slavery and human trafficking policies

Marks & Clerk is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Marks & Clerk is committed to acting ethically and with integrity in all our business processes and relationships. Marks & Clerk has implemented and enforces effective systems and controls to ensure slavery and human trafficking does not take place anywhere in our supply chains.

Marks & Clerk operates the following procedures that describe its approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing:** Marks & Clerk encourages all its workers, customers and other business partners to, without fear of retaliation, report any concerns related to modern slavery and human trafficking within its supply chains or direct activities. This includes any circumstances that may give rise to an

enhanced risk of slavery or human trafficking. Marks & Clerk supports openness about raising any concerns of human rights violations like modern slavery and staff are encouraged to report genuine concerns about wrongdoing or legal breaches.

- **Employee code of conduct:** Marks & Clerk makes clear to employees the actions and behaviour expected of them when representing the business. Marks & Clerk strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Recruitment/Agency workers policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

4. Due diligence - identifying, assessing and managing the risk of modern slavery and human trafficking

As a provider of intellectual property services the suppliers that support the operation of our business very broadly fall into the following general categories:

- counsel and experts;
- employee benefits;
- food and beverage;
- marketing and business development;
- telecommunications and information technology;
- utilities.

5. Effectiveness

Marks & Clerk has not discovered or been informed of any incidents of modern slavery or human trafficking during the financial year. In the event of a situation, risk or allegation occurring, the matter will initially be reported to the Board of Management and an appropriate investigation into any allegations would take place in accordance with our standards and procedures.

6. Future Steps

During the next financial year, Marks & Clerk will continue to:

- monitor and if necessary update any policies affected by the Act to reflect the continued commitment to implementing and enforcing effective practices and controls to ensure modern slavery is not taking place in our business and supply chains; and
- review and monitor procurement processes for new and existing suppliers.

Signed by:



David Ward
UK Managing Partner and Designated Member
Marks & Clerk LLP