

Board Submission Cover Sheet

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| Submission Name | Modern Slavery Act Statement |
| Author | R Bhandari |
| Department | Legal |
| Preparation Date | 20/03/2018 |
| Submission Date | 20/03/2018 |
| Key Summary | Updated website statement based on actions taken during the year. |
| Purpose of submission: (to note/for approval/decision required as applicable; where approval or decision is required, please explain the potential impact on Clients) | For approval |

Modern Slavery and Human Trafficking Statement

Opening statement:

Brewin Dolphin Holdings PLC and its subsidiaries (“Brewin Dolphin”) are responsible employers and seek to ensure that the behaviours and practices of our supply chain reflect our own business standards and compliance with applicable laws and standards. We take a zero tolerance stance on slavery and human trafficking within our workforce and expect the same from our supply chain.

Organisation structure and business of Brewin Dolphin:

Brewin Dolphin is a leading, independently-owned UK wealth manager with 29 offices employing 1,614 individuals as at 30th September 2017 and with its head office located in London.

Brewin Dolphin Holdings PLC is listed on the London Stock Exchange and is a member of the FTSE 250 index and is the holding Company for two wholly owned and regulated trading companies, Brewin Dolphin Limited (for the UK and Jersey) and Tilman Brewin Dolphin Limited (for the Republic of Ireland).

Supply Chains:

Brewin Dolphin does not act as a producer, manufacturer or retailer of any physical goods. As a provider of financial services, we do not have a very long or complex supply chain – our main vendors are providers of office supplies and support services such as reprographics, IT, recruitment, legal, accountancy, marketing, public relations and facilities management. While we consider our vendors to be at relatively low risk of engaging in practices of modern slavery and human trafficking, we nevertheless remain committed to preventing the occurrence of any such practices both in our business and our supply chain.

Policies in relation to Slavery and Human Trafficking:

As part of our commitment to combatting modern slavery, we have a Modern Slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships. We also require vendors whom we consider to be at a relatively higher risk of exposure to modern slavery to comply with the requirements of modern slavery legislation. We believe this approach is proportionate to the level of risk in our supply chain.

Due diligence processes:

In order to mitigate the risk of modern slavery and human trafficking in our supply chain, all new Brewin Dolphin vendors are required to complete a due diligence questionnaire before they engage with us. This questionnaire includes a requirement for vendors to confirm that they are not contravening slavery or human trafficking legislation. If a vendor is unable to provide such confirmation, Brewin Dolphin adopts a zero tolerance approach and would not engage that vendor.

Training:

In the last year, Brewin Dolphin has provided training to staff in roles considered to be at greater risk of exposure to incidences of modern slavery and human trafficking. There is an awareness campaign being rolled out to educate relevant staff members on the offences of modern slavery and human trafficking, as well as to make them aware of signs to look for to identify potential victims. The training is being targeted at a level which is suitable and reflective of the level of risk we face in this area.

Our effectiveness in combating slavery and human trafficking:

Brewin Dolphin has a whistleblowing procedure in place and also conducts annual staff engagement surveys, both of which are opportunities for employees to raise their concerns regarding slavery or forced labour. The whistleblowing procedure allows for issues of concern to be escalated to Board members as well as the executive management team so that they can be dealt with properly.

While we continue to develop our approach to combating modern slavery and human trafficking during the course of 2017 we will continue to assess and manage risks on an on-going basis. Our aim is to apply the same ethical standards to our employees and our vendors with transparency and accountability.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2017 and constitutes Brewin Dolphin's modern slavery and human trafficking statement for the financial year ending 30th September 2017.

Approved by the Board on 22 March 2018