

Modern Slavery and Human Trafficking Statement 2021/2022

Purpose of this statement

This statement is made on behalf of Simplify trading as; Advantage Property Lawyers, Cook Taylor Woodhouse, DC Law, JS Law, My Home Move Limited, Move with Us Conveyancing, Partners in Property U.K. Limited, Premier Property Lawyers, and Moving Made Easy (together, the Group) pursuant to section 54 (1) of the Modern Slavery Act 2015 (the Act).

The Statement was approved by the Simplify Senior Leadership Team on behalf of the Group on 18 October 2021. It was reviewed and approved by each of the individual entities comprising the Group which have obligations under the Act.

Introduction

Simplify takes its obligations in relation to the identification, reporting and prevention of slavery and human trafficking very seriously and has a zero-tolerance approach to all abuses of human rights. As a responsible business, the Group is committed to taking appropriate steps to ensure that slavery and human trafficking does not occur within any part of its own business or within its supply chain. We are committed to upholding and promoting human rights through the way we conduct our business, including our programme of charitable initiatives.

Overview of business activities

Simplify is made up of a collection of property and legal services companies and consists of a number of the UK's largest group of Conveyancing businesses. The Group's full-service capabilities are delivered by approximately 2000 people, across an expanding number of offices and home bases, who work in a highly integrated manner.

Countries of operation and supply

The Group currently operates in the United Kingdom, although the Group outsources some its commercial operations through Teamlease based in India.

Risk activities

The following activities are considered to be a risk of slavery or human trafficking:

- High volume recruitment via recruitment agencies

Recruitment/Agency Workers - the Group 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. Agencies are only engaged following the receipt of, and the Group agreement to, the agencies terms and conditions. Where Agency terms and conditions in anyway contravene the Groups commitment to ensuring that its supply chain does not contain any risks of modern slavery or human trafficking said agencies will not be used. Where taking on staff via agencies the Group People Services Team will be responsible for carrying out all checks to ensure individuals are eligible to work in the UK and ensuring that staff are aware of its policies and procedures.

Simplify supply chain

The Group has a relatively simple supply chain model that is built around supporting its core conveyancing practice and maintaining its office and technology infrastructure. The types of goods and services necessary to do so fall into seven broad categories:

- 1) Business services** - the diverse range of products and services the Group buys to ensure it can maintain normal day to day operations in its offices and support its core conveyancing practice, such as cleaning, catering, security, and print and document services;
- 2) Professional services** - the professional services the Group buys such as external training, audit services and advisory services in such areas such as regulation and insurance;
- 3) Real estate** - the office space the Group buys or leases to accommodate its people and operate its business;
- 4) Technology** - the systems, software and equipment that are necessary to maintain the global technology infrastructure that supports the Group;
- 5) Outsourcing services** – The Group outsources some of its commercial operations through TeamLease based in India.
- 6) Travel** - as a national law firm, mobility is essential and the Group works with a number of travel providers such as hotels, airlines, and train operators; and
- 7) Support Services** - provision of administrative support to enable exceptional client service.

We expect Companies within our supply framework to ensure their goods, materials and labour related supply chains:

- fully comply with the Modern Slavery Act 2015; and are
- transparent, accountable, and auditable; and are
- free from ethical ambiguities.

Due diligence

The Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Group's due diligence includes evaluating the modern slavery and human trafficking risks of each new Supplier.

Relevant policies

The Group has a number of existing policies and procedures which are relevant to mitigating the risk of slavery or human trafficking occurring in the Group's business or its supply chain. In particular, the following Group policies are directly relevant to the issues discussed in this statement.

Health and Safety Policy - this policy sets out the Group's commitment and approach to ensuring it provides a healthy working environment for its employees and contractors working onsite.

Bullying and Harassment Policy, Whistle Blowing Policy, Grievance and Equality and Inclusion Policy - combined these policies set out the Group's commitment and approach to preventing the occurrence of discrimination, harassment, bullying or victimisation in the work place.

Authority Limits and Contract Signing Policy - these policies set out the Group's internal control and governance procedures with regard to approving financial transactions and signing contracts with suppliers. The policy ensures that contracts cannot be entered into without an appropriate level of review and authorisation by a suitably senior member of staff.

Safeguarding Policy – This policy aims to protect all employees from abuse and harm and advises what they can do if they are suffering some type of abuse or they suspect someone else they know is at risk.

Simplify also provides its employees with access to an employee assistance programme (provided by an independent third party company) that can be used by its employees for free and confidential advice in relation to workplace concerns or issues as well as communicating clear processes for reporting concerns within the Group. We have an appointed Safeguarding Officer in place.

Training in relation to slavery and human trafficking

In the next 12 months, Simplify aims to provide training to employees involved in supply chain activities, to raise awareness of slavery and human trafficking as a problem that could potentially affect the Group's supply chain.

Simplify requires that all Human Resources (HR) professionals within the Group are aware of the Group's commitment to reduce the risk of any modern slavery or human trafficking within Simplify. HR professionals within the group will be made aware of:

- the basic principles of the Modern Slavery Act 2015;
- how to identify and prevent slavery and human trafficking;
- how to raise potential slavery or human trafficking issues to the relevant parties within Simplify; and
- the external help available, for example the Modern Slavery Helpline.



18 OCTOBER 2021

Statement signed by: David Grossman, Chief Executive