

# Modern slavery and human trafficking statement

## September 2018

This statement, made by Boulton Wade Tennant, is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending April 2019.

### Introduction from the Managing Partner and Chief Operating Officer

Boulton Wade Tennant is committed to doing business responsibly. Driving professional and business ethics, accountability and responsibility is very much part of who we are and how we behave. We believe we have a responsibility to uphold and champion the rule of law and its underlying principles. This statement, the first the firm is making under the Act, sets out the steps we have taken to address the risks of slavery. We are committed to improving our practices to combat slavery and human trafficking.

Signed on behalf of the partnership by:



John Wallace  
Managing Partner



Andrew Little  
Chief Operating Officer

### Definition

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

### Organisational structure

Boulton Wade Tennant is a specialist patent and trade mark firm. The firm is a partnership with five offices and 200 personnel.

We exist to help individuals and businesses protect, manage and enforce their intellectual property rights on a global scale. Our services cover the full range of intellectual property requirements from filing and prosecuting patent and trade mark applications to the managing of large and complex portfolios; from advocacy at opposition and appeal hearings to due diligence work and the provision of opinions. In addition we also offer an in-house search and watching facility, a full renewals service and a dedicated department for validating European Patents.

For further information about our organisation, please see [here](#).

### **Our supply chains**

Our business is office based and our primary supply chain categories support these operations. Categories include: office space, office service (including the provision of security, maintenance, catering, office supplies and cleaning), IT and technology, professional services, recruitment and business travel.

The majority of our suppliers are UK based and supply standard goods or services. We do not simply buy goods or services on cost based principles. We recognise there are areas of potentially higher risk and some services involving relatively high levels of contracted labour. We work to maximise control and coordination of suppliers, adopting a risk based approach to assess and manage, wherever necessary, any modern slavery risks in our supply chain.

### **Our policies on slavery and human trafficking**

As a regulated provider of IP services and employer of predominantly professionally qualified and highly skilled people, the risk of modern slavery and human trafficking existing within our business is considered low. We apply robust policies and procedures concerning employment screening and employment conditions in place.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The staff handbook makes it clear that in addition to penalties that may be imposed by law on individuals, any Boult Wade Tennant personnel who violates the policy stated in the staff handbook will be subjected to disciplinary measures up to and including termination of employment. The firm may seek to terminate its relationship with any supplier that is found to be in violation of section 54 (1) of the Modern Slavery Act 2015. Boult Wade Tennant will refer all appropriate matters to the enforcement authorities.

Boult Wade Tennant personnel and suppliers are held responsible for reporting at the earliest opportunity any activity that might lead to, or suggest, a breach of the policy in any part of the firm's business or supply chains. The firm is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that slavery of whatever form is or may be taking place in any part of the firm's business or in any of its supply chains, including if the report is mistaken.

### **Risk assessment**

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### **Supplier adherence to our values**

We have a zero tolerance approach to slavery and human trafficking. We have a dedicated group addressing risks in the area of modern slavery and ensuring that appropriate measures are applied to assess, manage and minimise risk.



BOULT WADE TENNANT

### **Training to raise awareness of modern slavery and human trafficking**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training to our staff.

### **Measuring effectiveness and next steps**

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Review the effectiveness of the Anti-Slavery and Trafficking Policy and Supplier Code of Conduct
- Ensure all key staff are trained in relations to the Modern Slavery Act and slavery and trafficking risks on an ongoing basis
- Develop appropriate systems to ensure that we engage appropriately with medium and higher risk suppliers based on our risk assessment process, to ensure they are aware of Boulton Wade Tennant zero tolerance approach to modern slavery whilst ensuring that we take appropriate measures to encourage and persuade them to adopt their own measures to minimise the risks of slavery and trafficking within their own organisations
- Monitor and consider response of those suppliers with whom we correspond to raise awareness of the Modern Slavery Act and to explain our policy commitments and the obligations
- Assess and consider the appropriateness of developing further measures including an audit with specific suppliers where we assess that there may be a heightened risk of slavery and trafficking within those organisations.

Boulton Wade Tennant  
September 2018

This information  
has been prepared by  
Boulton Wade Tennant.

For further information  
please contact your usual  
adviser.

T +44 (0)20 7430 7500  
F +44 (0)20 7430 7600

E [boulton@boulton.com](mailto:boulton@boulton.com)

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Registered office: Salisbury Square House, 8 Salisbury Square, London EC4Y 8AP

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A list of members of Boulton Wade Tennant LLP is available for inspection at the registered office at Salisbury Square House and on our website.

Offices in: London, Madrid, Berlin, Cambridge, Reading and Oxford and meeting facilities in Munich.