

# Modern Slavery and Human Trafficking Statement

**BTG Advisory and its corporate group (“Group”) is a business recovery, financial advisory and property services consultancy. This statement is published by the plc and by BTG Advisory LLP (a member of the Group) pursuant to Section 54 (1) of the Modern Slavery Act 2015 for the financial year ending 30 April 2023.**

Slavery and human trafficking remains a menace to society. Everyone has a responsibility to be alert to the risks of this, particularly in a business and its supply chain. Staff are expected to report concerns and management are expected to act on such concerns as well as taking steps to minimise the risks of slavery and human trafficking when engaging with suppliers.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery policy reflects 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 chain.

## Due Diligence Processes for Slavery and Human Trafficking

- As part of our initiative to identify and mitigate risk we contract with UK companies or UK branches of companies/businesses and through our approved supplier process we risk assess these suppliers and obtain assurances through our pre-contract supplier questionnaire.
- Our approved supplier regime ensures that we obtain evidence that our approved suppliers have suitable anti-slavery and human trafficking policies and processes in place and that they, at least, adopt one up due diligence of the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- Our supplier diligence is reinforced through binding contractual obligations and where possible indemnities. Where suppliers do not satisfy us of compliance through the pre-contract diligence process then they do not become approved suppliers and as such they are not used by the group within its supply chain.
- We monitor potential risk areas in our supply chain by looking to refresh and update the answers to our approved supplier questionnaire where possible on an annual basis.
- We have a system in place to protect whistle-blowers who report any concerns regarding anti-slavery and human trafficking through our whistle-blowing policy

## Supplier Adherence to Our Values

We have a zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, compliance with such values is enforced through our approved supplier contract management process and relationships which relevant commercial departments have with suppliers.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains in our business our group legal team educate and advise our group procurement managers who negotiate and contract with suppliers who provide services to the group as part of our approved supplier process. In addition to this all directors of the Group have been briefed on the subject and are updated annually on compliance. As part of our ongoing compliance programme, mandatory training on the risks of modern slavery and human trafficking will be made available to staff at all levels within our business.

## Our Effectiveness in Combating Slavery in Human Trafficking

We have risk assessed key suppliers in our relevant supply chains to identify the risk of any slavery and human trafficking occurring and where these risks exist we have supplied specific diligence questionnaires for completion by the supplier, which request specific evidence supporting relevant answers, as part of our approved supplier process to ensure that no slavery or human trafficking is taking place in its supply chain. This is something which is kept under review on an annual basis and which we implement as part of onboarding any new key supplier to the Group.

**The Begbies Traynor Group plc board of directors and the BTG Advisory LLP designated members approved this statement on Wednesday 5 July 2023.**

**Signed by: Ric Traynor  
Group Executive Chairman**