

2023 Modern Slavery and Human Trafficking Statement

Purpose of this Statement

This statement is made on behalf of Simplify trading as: Advantage Property Lawyers, Cook Taylor Woodhouse, DC Law, Gordon Brown 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 30 May 2023. 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 the group trading name for a collection of property and legal services companies, which consists of some of the UK's largest group of Conveyancing businesses. The Group's full-service capabilities are delivered by approximately 1800 people, across a 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 commercial operations through Teamlease based in India.

Risk Activities

The following activity could be considered a potential risk of slavery or human trafficking:

- High volume recruitment via recruitment agencies

Recruitment/Agency Workers – where necessary, the Group uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency 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 Group's 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 workers via agencies the Group People Services Team will be responsible for conducting all required checks to ensure individuals are eligible to work in the UK and ensuring that workers are aware of its policies and procedures.

Simplify Supply Chain

The Group has a simple supply chain model that 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 commercial operations through TeamLease based in India;
- 6) Travel** - as a national law firm travel is often required and the Group works with various travel providers such as hotels 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 are:
 - Fully comply with the Modern Slavery Act 2015;
 - Transparent, accountable, and auditable;
 - 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 workplace.

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 colleagues 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 all colleagues with access to an Employee Assistance Programme (provided by an independent third-party company) for free and confidential advice in relation to workplace concerns or issues as well as communicating clear processes for reporting concerns within the Group. In addition, we have an appointed Safeguarding Officer in place.

Modern Slavery and Human Trafficking Training

Simplify provides access to an online training module - 'Modern Slavery and Human Trafficking'- via the Simplify Learning portal.

The training is designed to raise awareness of modern slavery and human trafficking as a problem that could potentially affect the Group's supply chain, and in particular covers the key themes:

- the basic principles of the Modern Slavery Act 2015;
- how to identify and prevent slavery and human trafficking;
- what to do to report potential slavery or human trafficking issues to the relevant parties;
- what external help and resources are available.

Signed:



Date:

30 May 2023

David Grossman, Chief Executive