



# Bishop Fleming Modern Slavery and Human Trafficking Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Bishop Fleming to prevent modern slavery and human trafficking in our business and supply chains during the financial year ending 31 May 2026.

## Purpose and scope

Modern slavery is a serious and often hidden crime in which people are exploited for personal or commercial gain which includes slavery, servitude, forced or compulsory labour and human trafficking.

This statement applies to Bishop Fleming and any entities that it controls (together, the “Group”), Bishop Fleming LLP, Bishop Fleming Audit Limited, Bishop Fleming Holding Company Ltd and Bishop Fleming Probate Ltd who have a registered address of Brook House, Manor Drive, Clyst St Mary, Exter, EX5 1GD. Further information on our registration status and regulated activities can be found on our website [www.bishopfleming.co.uk/legal-information](http://www.bishopfleming.co.uk/legal-information).

It describes the steps we have taken during the period to prevent modern slavery and human trafficking within our business and across our supply chain and outlines our priorities for the year ahead.

**Our Commitment:** We recognise our responsibility to take a robust approach to identifying and mitigating the risk of modern slavery in and around our operations and have a zero-tolerance approach to modern slavery and human trafficking. We expect the same high standards from all those we work with and will not knowingly support or engage with any organisation involved in slavery or human trafficking.

## Our organisation and supply chain

Bishop Fleming is a dynamic UK chartered accountancy practice providing audit and assurance, tax, advisory and related professional services to our clients and we operate from 9 offices in the United Kingdom which for the purposes of the Act, are all part of our supply chain.

## Our governance, values and people

We are committed to acting ethically and with integrity, and to maintaining effective systems and controls to address the risk of modern slavery and human trafficking. We are regulated by the Institute of Chartered Accountants England & Wales (ICAEW) and operate within the requirements of professional standards and codes of ethics.

Further information on the ICAEW can be found at [www.ICAEW.com](http://www.ICAEW.com)

We are committed to treating people fairly and with respect. We aim to provide a safe, inclusive and supportive working environment, [pay people properly](#) for the work they perform and ensure that our employment practices comply with UK employment law.



Employing over 500 members of staff we promote [diversity and inclusion](#) and our staff are appraised and rewarded on our [ambitions and values](#) and ways of working.

Overall accountability for this statement and our approach to modern slavery sits with the Board. The Board reviews strategic and operational risks, including the risk of modern slavery and human trafficking, and ensures that appropriate controls are in place.

We promote a culture of speaking up. Our people are encouraged to raise concerns in confidence, and we provide reporting routes through Growth Coaches, people management and our whistleblowing arrangements (including the option to report confidentially). All our staff are required to read our Whistleblowing policy as part of their induction and undertake training as allocated throughout their employment.

### **Our recruitment and onboarding**

We recruit our People through our websites, direct referrals from existing colleagues and reputable agents. New starters are subject to appropriate pre-employment checks, including right-to-work verification, identity checks and required to evidence qualifications and references. We aim to ensure that terms of employment are clear, lawful and freely agreed and that no one pays fees to obtain work with us.

### **Training**

We provide appropriate awareness for our people so they understand what modern slavery is, how it may present, and what to do if they have concerns. Training and guidance on our intranet may be tailored to relevant roles (for example, those involved in procurement, facilities and recruitment).

### **Our supply chain and due diligence**

Our supply chain supports the delivery of professional services and includes both UK-based and international suppliers. It ranges from small local businesses to large national and global providers.

We recognise that the risk of modern slavery is generally higher in certain sectors and geographies. In our supply chain, the areas that may present relatively higher risk include labour intensive services such as cleaning, security, facilities management and catering, as well as certain manufactured goods (for example, IT hardware) sourced through multi tier supply chains.

Our approach to supplier due diligence is proportionate and risk based. We may: (a) assess supplier risk at onboarding; (b) request confirmation of modern slavery policies/statement where relevant; and (c) conduct periodic reviews of key suppliers.

We keep the risk of modern slavery under review as part of our wider risk management processes. We consider risk when onboarding suppliers and when changes occur for example, a new service provider, a new site, or a change in service delivery model.

As part of our supplier onboarding process, all new suppliers are issued with our Supplier Code of Conduct which is also publicly available on [our website](#). This document reinforces awareness of our values and obligations towards ensuring our supply chain does not support human trafficking or slavery.



Where we use labour intensive service providers (for example, cleaning), we seek assurance that appropriate right to work checks and fair working practices are in place. We may request confirmations from supplier management and review evidence on a case by case basis.

### **Our Commitment and plans - Measuring effectiveness**

We monitor the effectiveness of our approach using proportionate measures. These include:

- Completion of issued training in timelines
- Number of key suppliers with a Modern Slavery Statement (where legally required)
- Number of key suppliers with a Whistleblowing policy
- Number of concerns raised and investigated through our reporting channels, and actions taken.

In the past 12 months we have:

- Issued our supplier audit questionnaire to new “key” suppliers.
- Conducted the annual review of our top 50 suppliers to provide us with assurance that our supply chain is not supporting or involved in slavery or trafficking
- Issued refresher Modern Slavery training including the mandatory read of our Modern Slavery Statement to our people, raising awareness and education on the signs of slavery and to build their confidence in reporting suspicions.
- Conducted a periodic review of our supplier due diligence process
- Continued to work with Business in the community (BITC), our responsible business partners in understanding their approach to modern slavery in the accreditation process.
- Monitored and reported on concerns raised and investigated through our Whistleblowing process

Priorities for the year ahead:

- Refresh and re-issue the modern slavery guidance and communications for our People
- Undertake a targeted review of higher-risk supplier categories (for example, facilities and cleaning) and record actions taken.
- Expand the checks reviewed in our Annual Top 50 Supplier review to include Inclusivity and Diversity and gender pay statements
- Continue to issue relevant training to our People
- Send the Supplier Code of Conduct to all our Top 50 suppliers and those in higher risk sectors as a cyclical renewal
- Continue to monitor and report on effectiveness measures, updating this statement annually

## Our policies and related standards

Our Whistleblowing policy encourages the reporting of concerns by our People and third parties (including suppliers) in relation to a risk, malpractice or wrongdoing that affects others. The policy is designed to ensure that individuals feel able to make disclosures without fear of reprisal.

We also maintain a range of policies and procedures that support ethical and transparent business practices, including ICAEW Code of Ethics, anti-bribery and corruption, anti-money laundering, safeguarding/confidentiality, and supplier or procurement standards.

On a quarterly basis, we report to the EMPQR committee on the number of queries raised and any instances that have occurred in these areas. Through the cycle of ongoing monitoring, we are able to recognise any trends emerging and implement any necessary actions as an outcome.

## Approval and review

This statement applies to the financial year ending 31 May 2026 and has been approved by the Board who will review and update it annually within the framework of the Modern Slavery Act 2015.

A handwritten signature in black ink, appearing to read 'A Sandiford', with a stylized, cursive script.

Andrew Sandiford

**Managing Partner**  
**July 2026**