

Modern Slavery Transparency Statement 2022

Our structure and supply chain

As a law firm, Freeths provides legal advice to private and commercial clients in the UK and across the public and private sectors. We have 12 offices located the UK and have a total complement of about 1,000, which includes nearly 160 partners. For the financial year ended 31 March 2022 our turnover was £111,962,000.

As a professional services business, Freeths predominantly employs professionally qualified and highly skilled people. Our mission is to be recognised as the UK's leading nation law firm and our people are at the heart of achieving this mission. We want Freeths to be a dynamic, inclusive and rewarding place to work for all of our employees and Partners and this means that many of our employee benefits are enhanced beyond the statutory minimum. We are proud of our ongoing and detailed programme to support the health and wellbeing of our people which includes free access to our Employee Assistance Programme and online GP service. To ensure legal compliance, we have a robust vetting process for all new employees, which includes a review of the legal right to work in the UK.

“Doing the right thing” also means that we are committed to ensuring that we not only provide the highest standard of legal services to our clients, but that we do this in the most ethical and sustainable way possible. Our ESG (Environmental, Social and Governance) Committee coordinate our ESG activities and have oversight of and review the impact that Freeths has on the environment and our communities. Central to our ESG approach is creating a diverse and inclusive working environment where all voices are heard. Our grievance and whistleblowing processes provide clear guidance for staff about how to raise concerns, which could include concerns relating to modern slavery and human trafficking. We encourage our people to feel empowered to call out any breaches of our policies (including any concerns related to Modern Slavery), and our “work in confidence app” supplements our reporting channels.

Anti-slavery & Human Trafficking Policy

Our standalone Anti-slavery and Human Trafficking Policy reflects our commitment to implementing and enforcing effective practices and controls to ensure modern slavery is not taking place in our firm or supply chain. Underpinning our Anti-slavery and Human Trafficking Policy is a suite of policies that reinforce our commitment to the identification and prevention of modern day slavery.

We list below some of the relevant policies:

- Our Whistleblowing Policy enables our staff to confidentially report any genuine concerns relating to modern day slavery, human trafficking or human rights violations and to give assurance that these concerns will be dealt with appropriately. This includes matters pertaining to our supply chain, which would include modern slavery.
- Our “work in confidence” application provides a confidential channel to discuss or report concerns and again this could include concerns linked to modern day slavery or human trafficking.
- Our Diversity and Inclusion Policy encourages all our staff and partners to value diversity and respect each person’s individuality, and to ensure that no partner, employee, agency worker, contractor, self-employed consultant, job applicant, ex-

employee, client or third party receives less favourable treatment based on their colour, race, nationality, ethnic or national origins, sexuality or gender, disability, age or religion or belief.

- Our Anti-bribery Policy and training programme set out the firm's rules and what is expected of our employees, partners, contractors, and third-party service providers in relation to all dealings on our behalf.

Supplier Due Diligence and Risk Assessment

We are committed to improving our practices to enable us to identify and eradicate any modern slavery or human trafficking within our supply chain.

To further improve the robustness of our current processes and policies, we engaged an independent procurement specialist to carry out a detailed review of our supply chain and procurement practices and policies. This review identified recommendations, some of which we have already implemented and others we plan to implement in the next financial year.

As an example, we have already implemented the following changes to our supply chain process:

- All new material supplier contracts require sign off in accordance with a formal authorisation policy. This safeguards our risk based approach to supplier management and enables us to establish minimum conditions that our suppliers must meet.
- Introduced an ongoing contract review process and ad hoc reviews for smaller or regular suppliers.

To further improve our supply chain process, we are also planning to:

- Introduce a suite of policies which will formally document and facilitate our supply chain processes.
- Appoint an independent third party to manage our supplier relationships and processes.
- Introduce annual compulsory refresher training about Modern Day Slavery for those in high-risk roles or who have direct responsibility for procuring services on behalf of Freeths.

We also have ongoing engagement with our suppliers to seek reassurance about their compliance with the legislation and we are in discussions with our key suppliers regarding a framework "Supplier Charter" that places emphasis on compliance with Freeths' core values and the prevention of modern day slavery and human trafficking in our supply chain. We anticipate that this framework will be formalised during the financial year 2022/23.

Our Chief Operating Officer has primary and day-to-day responsibility in relation to our supply chain and for implementing this policy, monitoring its use and effectiveness, dealing with any queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Training

Our Anti-slavery and Human Trafficking Policy applies to all persons working for and on behalf of Freeths. All persons have an explicit responsibility for adhering to the policy. The prevention, detection, and reporting of modern slavery both within our firm or supply chain is the responsibility of all those working for us including employees, partners and third parties.

All staff (employees and partners) have been made aware of the firm's Anti-slavery and Human Trafficking Policy and the Policy is available on the intranet for everyone to access. We also provide an annual update to all staff to remind them of their responsibilities under the Act, the training available to them and how they should raise any concerns that they may have.

We have completed firm wide compulsory training for all employees and partners to raise awareness of issues surrounding modern day slavery and human trafficking and this training continues to be a requirement for new starters to the firm. Following the detailed review of our supplier processes, we are planning compulsory refresher training for anyone who has responsibility for contract management or procuring services on behalf of Freeths.

Further Steps

As part of our social responsibilities, our ESG Committee review our processes to ensure that we do the right thing both within our firm, in our supply chains and in our communities. Therefore, we continually monitor our procurement process and will continue to introduce specific measures to ensure that our obligations under the Act are passed through our supply chain.

Measuring Effectiveness

There have been no reported incidents of modern slavery or human trafficking during the financial year April 2021 to March 2022. If any concerns were to be raised, then a full investigation would be carried out and appropriate action taken in accordance with our policies and procedures.

Responsibility and Board Approval

The firm's Chief Operating officer and HR Director have responsibility for overseeing the effective implementation of our Anti-slavery and Human Trafficking Policy and for the annual preparation of the anti-slavery and human trafficking statement. They ensure individuals reporting to them understand and comply with our Policy.

The Chief Operating Officer reports annually to our ESG Committee and to the Management (Main) Board regarding any slavery and human trafficking issues. To date no issues have been raised.

This statement has been reviewed by the Freeths ESG Committee and the Management Board has approved the statement on behalf of our members. This statement relates to our financial year April 2021 to March 2022.

Signed



Date: 7th September 2022

Paul Thorogood
Designated Member