

FREETHS

Statement pursuant to the Modern Slavery Act 2015

Freeths core value is “doing the right thing” and therefore we have a zero tolerance approach to modern day slavery and human trafficking both within our firm and in our supply chains. This statement is made on behalf of Freeths LLP pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement.

1. ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

In 2016 we completed a review of our internal policies to ensure compliance with the Modern Slavery Act and as a result we introduced a standalone Anti-slavery and Human Trafficking Policy. This reflects our commitment to implementing and enforcing effective practices and controls to ensure modern slavery is not taking place in our firm or supply chains. Our anti-slavery and Human Trafficking Policy reflects our zero tolerance approach to modern day slavery and our commitment to doing the right thing across all aspects of our operations, including our supply chains.

As part of the review, we also updated our Whistleblowing Policy to enable 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.

2. RESPONSIBILITY

We have appointed a compliance director, the Chairman, with responsibility, together with the HR Director and compliance officer, for overseeing implementation of Anti-slavery and human trafficking policies and procedures and annual preparation of the anti-slavery and human trafficking statement.

The compliance director and compliance officer report quarterly to the diversity and inclusion committee and annually to the Board on slavery and human trafficking issues. To date no issues have been raised.

3. SUPPLIER DUE DILIGENCE

We are committed to improving our practices to enable us to identify and eradicate any modern slavery or human trafficking within our supply chains. To date, we have instigated a comprehensive firm-wide risk assessment, clearly mapping the firm's supply chains across multiple tiers and identifying potential touch-points for modern slavery. The results of this assessment will shape our future due diligence processes and we will focus our attention on the highest risk areas identified to ensure that our obligations under the Act continue to be met.

Going forward, as a minimum we will be seeking reassurance from relevant suppliers on their compliance with the legislation.

4. TRAINING

All staff have been made aware of the firm's anti-slavery and human trafficking policy. This policy applies to all persons working for us or on our behalf in any capacity. All managers dealing with those most at risk of encountering modern slavery issues, such as those working in the areas of procurement and business operations, must ensure those individuals reporting to them understand and comply with our Anti Slavery and human trafficking Policy.

5. EFFECTIVENESS

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

6. FURTHER STEPS

We plan a full review of our procurement process and will be introducing specific measures to ensure that our obligations under the Act are passed through our supply chain. This is likely to include:

- A requirement for all new suppliers to complete a supplier's statement confirming they comply with all anti-slavery laws and that they have effective procedures and controls in place to ensure that their business and supply chain is free from slavery or human trafficking.

- Implementing a process to vet every new supplier and carry out a risk analysis based on the nature and value of the product or service.
- Requesting existing suppliers complete a supplier's integrity statement at the time of their next renewal.
- Raising awareness of this Statement and our anti-slavery and human trafficking policy as part of the 'new joiner' induction process.
- Review our training program for key stake holders such as those involved with procurement or business services and make recommendations for improvements.
- Produce a guide for our Corporate and Commercial lawyers to raise awareness of human rights issues when advising clients on corporate due diligence.

Colin Flanagan
Chairman
Freeths LLP