

# FREETHS

## Statement pursuant to the Modern Slavery Act 2015

At the core of Freeths' values 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 chain. 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. Structure and Supply chain

Freeths is a supplier of legal services to the UK domestic market. We provide legal advice to private and commercial clients across the public and private sectors. We have 13 offices across the UK and have 879 employees, which includes 153 partners. For the financial year end March 2019 our annual turnover was £89m.

As a professional services business, Freeths predominantly employs professionally qualified and highly skilled people. Our supply chain consists of goods and services procured to enable our people to deliver these services. Our relationships with sub-contractors, suppliers and their employees, business partners, agents and others working on their behalf (collectively "Third Parties") principally include those providing professional services, consultancy, counsel, experts, facilities management, payroll, training providers, information technology and telecommunications.

### 2. 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. 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 chain.

Underpinning our Anti-slavery and Human Trafficking Policy is a range of policies that outlines our commitment to the identification and prevention of modern slavery in our firm and supply chain.

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 **Diversity and Inclusion Policy** encourages all our employees 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 or ex-employee, client or third party receives less favorable treatment on the basis of color, race, nationality, ethnic or national origins, sexuality or gender, disability, age or religion or belief.
- Our **Anti-bribery Policy** sets out the firm's rules and what is expected of our employees, partners, contractors and third-party service providers in all dealings on our behalf.

Freeths is also committed to supporting the health and wellbeing of our employees and partners. We provide free access to support, confidential advice and assistance on matters which include workplace concerns or issues.

### 3. 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.

We have undertaken and are finalising our firm wide risk assessment, clearly mapping the firm's supply chain 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.

We have ongoing engagement with our suppliers to seek reassurance about their compliance with the legislation.

#### **4. Measuring Effectiveness**

There have been no reported incidents of modern slavery or human trafficking during the financial year April 2018 to March 2019. 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.

#### **5. 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 all staff to access. In 2018, we introduced firm wide compulsory training for all employees and partners (both current and new) to raise awareness of issues surrounding modern day slavery and human trafficking.

Our National Administration and Facilities Manager, 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. They ensure individuals reporting to them understand and comply with our Policy.

#### **6. Further Steps**

As part of our ongoing review of the firm wide risk assessment, we monitor our procurement process and will be introducing specific measures to ensure that our obligations under the Act are passed through our supply chain. These could 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.
- Requesting existing suppliers complete a supplier's integrity statement at the time of their next renewal.
- Reviewing our training programme for key stakeholders such as those involved with procurement or business services and make recommendations for improvements.
- In relation to all existing and new staff employed by our facilities management third party provider, ensuring that these staff receive training equivalent to an employee of the firm.

#### **7. Responsibility and Board Approval**

The firm's Chairman 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.

The Chairman and the HR Director report annually to the diversity and inclusion committee and to the Board regarding any slavery and human trafficking issues. To date no issues have been raised.

This statement relates to our financial year April 2018 to March 2019. The Freeths Board approved this statement on behalf of the members on 12<sup>th</sup> June 2019.

Signed

A handwritten signature in black ink, appearing to read 'P. Thorogood', written in a cursive style.

Date: 3rd October 2019

Paul Thorogood  
Designated Member