

# 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.

### 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 850, which includes nearly 160 partners. For the financial year ended 31 March 2021 our turnover was £102m.

As a professional services business, Freeths predominantly employs professionally qualified and highly skilled people. We have a robust vetting process for all new employees, which includes a review of the legal right to work in the UK. Of course legal compliance with UK employment legislation is vital, but we want to go further than that. Our vision is to be a leading supplier of legal services to the UK domestic market and our people are at the heart of achieving this vision. Many of our employee benefits are enhanced beyond the statutory minimum and we have an ongoing and detailed programme to support the health and wellbeing of our staff and free access to our Employee Assistance Programme.

"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. We have recently established our ESG (Environmental, Social and Governance) Committee to have oversight of and coordinate our ESG activities 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 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 the recent introduction of our "work in confidence app" supplements our existing 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 range 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 any 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 on the basis of 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 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. We are engaging with independent procurement specialists with a view to appointing a third party to further improve the robustness of our current processes and policies. We also have ongoing engagement with our suppliers to seek reassurance about their compliance with the legislation and commenced discussion with them regarding a framework “Supplier Charter” that places emphasis on compliance with Freeths’ core values and the prevention of modern day slavery and human trafficking. We anticipate that this framework will be formalised during the financial year 2021/22.

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 all staff to access. We have 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. Next year, we are planning to introduce compulsory refresher training.

## **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 2020 to March 2021. 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 relates to our financial year April 2020 to March 2021. This statement has been reviewed by the Freeths ESG Committee and the Management Board has approved the statement on behalf of our members.

Signed

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

Date: 21<sup>st</sup> September 2021

Paul Thorogood  
Designated Member