
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

Freeths is a supplier of legal services to the UK domestic market. We provide legal advice to private and commercial clients in the UK across the public and private sectors. We have 13 offices across the UK and have a total complement of over 900, which includes 160 partners. For the financial year ended 31 March 2020 our turnover was £102m.

As a professional services business, Freeths predominantly employs professionally qualified and highly skilled people. We comply with all applicable employment legislation relating to employee terms and conditions, including pay, and many of our benefits are enhanced. Within the UK, all of our employees earn at least the minimum living wage. Alongside this, we have an ongoing and detailed programme to support the health and wellbeing of our staff.

We are also committed to creating an 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. 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.
- We recently launched our "work in confidence" application which enables employees to confidentially discuss or report any concerns that they have.
- 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 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.

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 could also include workplace concerns or issues.

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 continue to undertake and finalise 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 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.

Our Chief Operations 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. They ensure individuals reporting to them understand and comply with our Policy.

Measuring Effectiveness

There have been no reported incidents of modern slavery or human trafficking during the financial year April 2019 to March 2020. 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.

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 and this training continues to be a requirement for new starters to the firm. Next year, we are planning compulsory refresher training for all staff.

Further Steps

As part of our ongoing review of the firm wide risk assessment, we continually 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.

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 2019 to March 2020. This statement has been reviewed by the Freeths Board and approved on behalf of the members.

Signed

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

Date: 15th January 2021

Paul Thorogood
Designated Member