
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 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 & HUMAN TRAFFICKING POLICY

Following a review of our internal policies to ensure compliance with the Modern Slavery Act we introduced a standalone Anti-slavery and Human Trafficking Policy. This 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 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

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.

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.

We have instigated a 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.

We also engage with our suppliers to seek reassurance about their compliance with the legislation.

4. TRAINING

All staff 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. The policy applies to all persons working for us or on our behalf in any capacity.

In 2018 we are rolling out firm wide compulsory training for all staff to raise awareness of issues surrounding modern day slavery and human trafficking.

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

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.
- Rolling out the compulsory e-learning training programme for all current staff and new joiners to the firm to raise awareness of this Statement and our anti-slavery and human trafficking policy.
- Reviewing our training programme for key stake holders such as those involved with procurement or business services and make recommendations for improvements.

Chairman
Freeths LLP