

Modern Slavery Transparency Statement 2024

Our structure and supply chain

As a law firm, Freeths provides legal advice to private and commercial clients in the public and private sectors across the UK. We have 13 offices and a total complement of 1,200 people, including circa 170 partners. For the financial year ended 31 March 2024 our turnover was £144.8m.

As a professional services business, Freeths predominantly employs professionally qualified and highly skilled people. Our mission is to be recognised as the UK's leading national law firm and our people are at the heart of achieving this mission. We want Freeths to be a dynamic, inclusive and rewarding place to work for all our employees and partners; our Diversity and Inclusion (D&I) Strategy sets out a roadmap for achieving this. We are proud of our ongoing programme to support the health and wellbeing of our people, which includes free access to our Employee Assistance Programme, an online GP service, a structured Promotion Pathway, an extensive wellbeing programme and many employee benefits, which are enhanced beyond the statutory minimum. To ensure legal compliance, we have a robust vetting process for all new employees, which includes a review of their legal right to work in the UK.

We are guided by our brand values: Being 'bold', 'smart', and acting 'together' ensures we provide the highest standard of legal services to our clients, and we do so in the most ethical and sustainable way possible. Our ESG (Environmental, Social and Governance) Committee coordinates our ESG activities and oversees and reviews the impact 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 about how to raise concerns, which could also include matters 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 our "Work in Confidence App" supplements our reporting channels, enabling anonymous reporting.

Anti-slavery & Human Trafficking Policy

We have a zero-tolerance approach to modern slavery and human trafficking. 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 this policy is a suite of policies that reinforces our commitment to the identification and prevention of modern slavery.

We list below some of the relevant policies:

- Our Whistleblowing Policy enables our staff to confidentially report any genuine concerns relating to modern 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' app provides a confidential channel to discuss or report concerns and again this could include concerns linked to modern slavery or human trafficking.

- Our D&I 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 based on their colour, race, nationality, ethnic or national origins, sexuality or gender, disability, age, background 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 relation to 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 have ongoing engagement with our current suppliers to seek reassurance about their compliance with legislation and we have recently introduced a Supplier Code of Conduct. Our Supplier Code of Conduct places emphasis on compliance with Freeths' core values and the prevention of modern slavery and human trafficking, and it is a requirement that all suppliers demonstrate their commitment to this.

In relation to new suppliers, all new material supplier contracts require approval in accordance with a formal authorisation policy. This safeguards our risk-based approach to supplier management and enables us to establish minimum conditions that our suppliers must meet, as laid out in our Supplier Code of Conduct.

We take a risk-based approach to our supply chain management. Having identified that the management of our Facilities Services is a high-risk area, we appointed a third-party independent specialist supplier to manage these services. Our selection process required the supplier to demonstrate its commitment to our Supplier Code of Conduct, demonstrate robust processes for eliminating modern slavery and human trafficking in their business, become a living wage employer and demonstrate their excellent employment practices, including employee wellbeing policies.

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 and supply chain is the responsibility of all those working for us including employees, partners and third parties.

All of our colleagues (employees and partners) have been made aware of the firm's Anti-slavery and Human Trafficking Policy, which is available on the Freeths intranet for everyone to access. We also provide an annual update to all staff to remind them of their responsibilities under the Act, the training available to them and how they should raise any concerns that they may have.

We have completed firm-wide, compulsory training for all employees and partners to raise awareness of issues surrounding modern slavery and human trafficking and this training continues to be a requirement for new starters to the firm.

Further Steps

As part of our social responsibilities, our ESG Committee reviews our processes to ensure we do the right thing within our firm, in our supply chain and in our communities. Therefore, we continually monitor our procurement process and will continue to introduce specific measures to ensure 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 2023 to March 2024. If any concerns were to be raised, 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 has been reviewed by the Freeths ESG Committee, and the Management Board has approved the statement on behalf of our members. This statement relates to our financial year April 2023 to March 2024.

Signed

A handwritten signature in black ink, appearing to read 'CF', is positioned below the 'Signed' text.

Chris Freeston

Date: 25.09.24

Designated Member