FREETHS

# Human Rights Policy

Version: 01

**Policy Owner:**

**Chris Oglethorpe**
Chief People Officer

**Freeths LLP is committed to respecting internationally recognised human rights in our own operations and across our value chain. We recognise that, as a law firm, our human rights responsibilities arise through our role as an employer and business operator, through the goods and services we buy, and through legal services where our work may be linked to impacts on people.**

**This policy sets out our commitment to respect human rights, how we identify and address human rights risks, and how concerns can be raised and addressed. It is supported by our wider responsible business, employment, procurement, risk and compliance frameworks.**

## 1. Our commitment

Freeths is committed to respecting human rights in line with all material aspects contained within:

- the UN Guiding Principles on Business and Human Rights
- the International Bill of Rights, including the Universal Declaration of Human Rights;
- the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Freeths' human rights saliency assessment is reviewed annually, identifying and prioritising any actual and potential negative human rights impacts affecting people connected to the firm's activities and business relationships.

We are committed to:

- respecting human rights in our business activities and relationships;
- assessing actual and potential negative human rights impacts connected to our operations and value chain;
- taking steps to prevent and mitigate adverse human rights impacts; and providing for or cooperating in remediation where Freeths has caused or contributed to an adverse human rights impact.

## 2. Scope

This policy covers individuals and communities who may be affected by Freeths' own operations and value chain. This includes our partners, employees, contractors, clients, communities or individuals potentially affected by the activities of clients or matters on which we advise, and our community partners and beneficiaries.

## 3. Our priority human rights issues

Freeths' human rights saliency assessment identifies the following as the most salient human rights issues for the firm to monitor and manage closely as required, in line with themes relevant to the wider legal sector:

- money laundering, illicit finance and PEP-linked exposure;
- discrimination, harassment, bullying and unequal opportunity;
- modern slavery, forced labour and labour exploitation;
- workload, stress and psychological safety;
- safeguarding, abuse and exploitation;
- client-related linkage to adverse human rights impacts;
- freedom to speak up, grievance and remedy;
- health, safety and physical wellbeing;
- privacy and data protection.

## 4. How we put this into practice

We seek to identify and manage human rights risks through relevant policies, procedures and governance processes across the firm. These include:

- workplace policies and practices covering equity, diversity and inclusion, bullying, harassment, wellbeing, grievance and privacy;
- risk and compliance processes, including anti-money laundering and related controls relevant to risks of harm linked to illicit finance and sanctions exposure client and matter due diligence, including screening of new organisational clients and matters and enhanced scrutiny of certain higher-risk sectors and instructions;
- procurement and supply chain controls, including our Supplier Code of Conduct and a risk-based approach to supplier oversight, with enhanced due diligence in higher-risk areas;
- modern slavery controls, reflecting a zero-tolerance approach to modern slavery and human trafficking in our firm and supply chain.

## 5. Access to remedy

Freeths is committed to supporting access to remedy for people who may be adversely affected by our operations or business relationships, particularly where the firm has caused or contributed to an adverse impact.

We maintain processes that enable concerns to be raised and addressed, including:

- grievance procedures for employees, workers and partners to raise workplace concerns and have them investigated fairly;
- anti-bullying and anti-harassment procedures for concerns relating to dignity, respect and treatment at work;
- whistleblowing channels for concerns raised in the public interest, including concerns relating to modern slavery, health and safety, unethical behaviour and legal non-compliance; our whistleblowing policy states that staff must not suffer detrimental treatment because they have raised a concern and must not be threatened or retaliated against;
- client complaints processes, which include investigation and potential remedies such as apology, reimbursement, write-off of unbilled time or compensation, and signposting to the Legal Ombudsman and the Solicitors Regulation Authority where relevant.

Where concerns are substantiated, Freeths will take appropriate corrective action and, where relevant, provide or cooperate in remediation consistent with the nature of the issue and the firm's

role. This reflects the approach recommended in Freeths' saliency assessment and the access to remedy pathways already embedded in firm policies.

## 6. Governance

This policy is owned by the Chief People Officer and is approved by the Partnership Board.

The CPO sits on our Responsible Business Committee (RBC), which oversees our firm's impact as a responsible business in relation to our colleagues, communities, climate and clients, and also includes the firm's Senior Partner, COO, COLP, Chair of the Partnership Board and Director of Responsible Business. The Responsible Business Committee is a sub-committee to the Executive Board, which is chaired by the Managing Partner and responsible for firmwide strategy implementation.

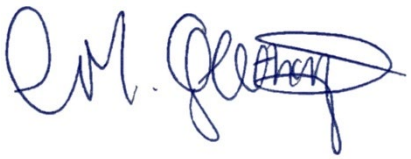
The RBC also prepares an annual report for the Partnership Board. The Partnership Board is responsible for:

- Approving the firm's strategy
- Providing oversight of the Executive Board;
- Overseeing risk and governance;
- Representing the interests of partners in significant decisions and safeguarding the firm's culture and values.

## 7. Review

This policy will be reviewed at least annually, or sooner if there is a material change in Freeths' operations, value chain, risk profile or relevant legal and regulatory expectations.

Signed:



Chris Oglethorpe. Chief People Officer

July 2026