Anti-slavery statement

This statement is made on behalf of TLT LLP and TLT NI LLP (together "TLT"). Reference to "we" or "us" are references to each of these two entities.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that we have taken to mitigate the risk of modern slavery or human trafficking occurring within our operations or supply chain with respect to the financial year ending 30 April 2023.

Our structure

TLT LLP and TLT NI LLP operate as limited liability partnerships registered in England and Wales and Northern Ireland, with over 1,500 employees and partners across six UK offices and a small team in Piraeus.

Our operations

Our principal activity is the provision of commercial legal services to our clients. Our activities are regulated in each of the jurisdiction in which we operate, this includes but is not limited to the Solicitors Regulation Authority of England and Wales, the Law Society of Northern Ireland, the Law Society of Scotland and the Financial Conduct Authority.

We consider the risk of modern slavery and human trafficking existing within our operations to be relatively low given that we are a regulated practice providing legal services to clients, and primarily employing legal professionals and qualified legal support staff.

Our supply chain

Our supply chain predominantly consists of goods and services procured to enable us to deliver legal services to our clients. The sourcing and purchasing of goods and services is supported across the firm by our procurement team based in Bristol. The key categories of goods and services that we procure are property space, facilities management, human resources, information technology, other professional services, cleaning, hospitality and catering.

Supply chain risk areas

In order to identify and assess any actual or potential involvement in modern slavery in our supply chain, we risk rate suppliers, including according to factors that might indicate a high risk of modern slavery such as the location from which services are provided or goods are manufactured and the sectors or activities which present a high risk of modern slavery.

We have identified that the parts of our business and supply chain that carry a potential risk of modern slavery are predominantly those which involve suppliers providing goods and services outside the UK.

Addressing supply chain risks

Our modern slavery strategy and due diligence process is developed and reviewed by our Procurement and Risk and Compliance teams to ensure that we take a coordinated approach across the Firm. The steps we are taking to assess and manage modern slavery risks are outlined in this statement. We have undertaken and will continue to update such assessments and steps on an annual basis. We continue to build on this process to gain further visibility into our supply chain, including by regular review and internal audit of our data sets.

We seek to mitigate the risk of modern slavery in our supply chain by:

- requiring all our suppliers to complete our Due Diligence Questionnaire. We review the supplier's responses and will follow up any concerns ensuring that we do not renew or award contracts to any supplier that presents a risk of modern slavery. This questionnaire also requires suppliers to commit to respecting and supporting international human rights and undertake that they will comply with their obligations under the Modern Slavery Act 2015;

- investing in educating our employees to recognise the risks of slavery and human trafficking in our business and supply chain. We provide mandatory modern slavery e-learning for all new starters and mandatory annual refresher training for all staff. We also maintain a live database of all policies which employees can readily access on the Firm's intranet;
- implementing a whistleblowing facility that provides a confidential mechanism for individuals to disclose any suspicions of impropriety. It is the responsibility of all those working for us or under our control to detect, report and prevent modern slavery from occurring within our business or supply chain;
- the fact that our offices and suppliers are based in low-risk locations; and
- wherever possible seeking supplier agreement to our standard supplier terms which includes warranties that the supplier will comply with all applicable laws (including the Modern Slavery Act) and our Modern Slavery Policy and allows us to terminate immediately for any breach of these warranties.

Our policies

TLT is committed to acting ethically and with integrity in all our business dealings and relationships and has a zero-tolerance policy against human trafficking and slavery. This includes implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our business or in any of our supply chains.

We have introduced a number of policies that support our commitment to preventing acts of slavery and human trafficking. All policies are reviewed at least annually to ensure continued compliance with the Modern Slavery Act 2015. These include:

- Anti-slavery Policy – ensuring that TLT LLP and TLT NI LLP maintain compliance with the Modern Slavery Act 2015. We expect the same standard of conduct from the firm's contractors and third-party service providers in all dealings on our behalf.
- Anti-bribery and corruption policy – ensuring that we meet our commitment to act professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery and corruption. The firm takes a zero-tolerance approach to bribery and corruption.
- Anti-money laundering and counter terrorist financing – ensuring compliance with the provisions of the Money Laundering Regulations 2017, the Proceeds of Crime Act 2002, the Terrorism Act 2000, and the Criminal Finances Bill 2017.The firm takes a zero-tolerance approach to money laundering and terrorist financing.

- Procurement and Supplier Management Policy – ensuring suitable vetting of our supply chain and an on-going management and review of all our suppliers.
- Responsible Business Policy – ensuring that TLT LLP and TLT NI LLP operate in a responsible way, making a positive impact on the local and national communities.
- Recruitment Policy and Screening and Vetting Policy – ensuring that all individuals employed by TLT LLP and TLT NI LLP are appropriately vetted and have the right to work in the UK.
- Rewards Policy – ensuring compliance with all relevant employment legislation and that remuneration is open and transparent, fair and equitable, and competitive in the market in which we operate.
- Whistleblowing Policy – ensuring fair process and protection for whistleblowers. TLT encourages all of its employees to report any concerns related to the activities of the Firm. The Firm's whistleblowing procedure is designed to ensure that any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the individual who raised the issue.
- Equality and Diversity Policy - ensuring compliance with relevant equality legislation, the Equality Act 2010, Codes of Conduct and regulations. We are committed to empowering our people and ensuring every individual is treated with dignity and respect. This extends to our relationships with clients, suppliers, contractors and third parties.

Performance indicators and review

We review our policies and processes with regards to modern slavery on a regular basis. We also engage externally to understand latest best practices and data with regards to modern slavery.

In the financial year ending 2024 we will continue to develop our response to addressing the modern slavery risks occurring in our operations and our supply chain. We will continue to:

- screen all potential new suppliers and require them to confirm their own and their supply chain's compliance with the Modern Slavery Act;
- ensure that the responses from the Due Diligence Questionnaire of all current and future suppliers are satisfactory and continue to be satisfactory with regards to their efforts made to prevent human trafficking and slavery;

- review our key policies and standard supplier terms in relation to modern slavery and human trafficking and undertake internal audits;
- provide training on modern slavery awareness and prevention to all individuals within the firm; and
- risk assess our existing supply chain.

Consultation and Board approval

This statement was prepared by our Risk and Compliance team with input from our Procurement and HR teams and reviewed by our managing partner prior to its formal approval by the Executive Board.



John Wood, Managing Partner, TLT LLP

September 2023

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