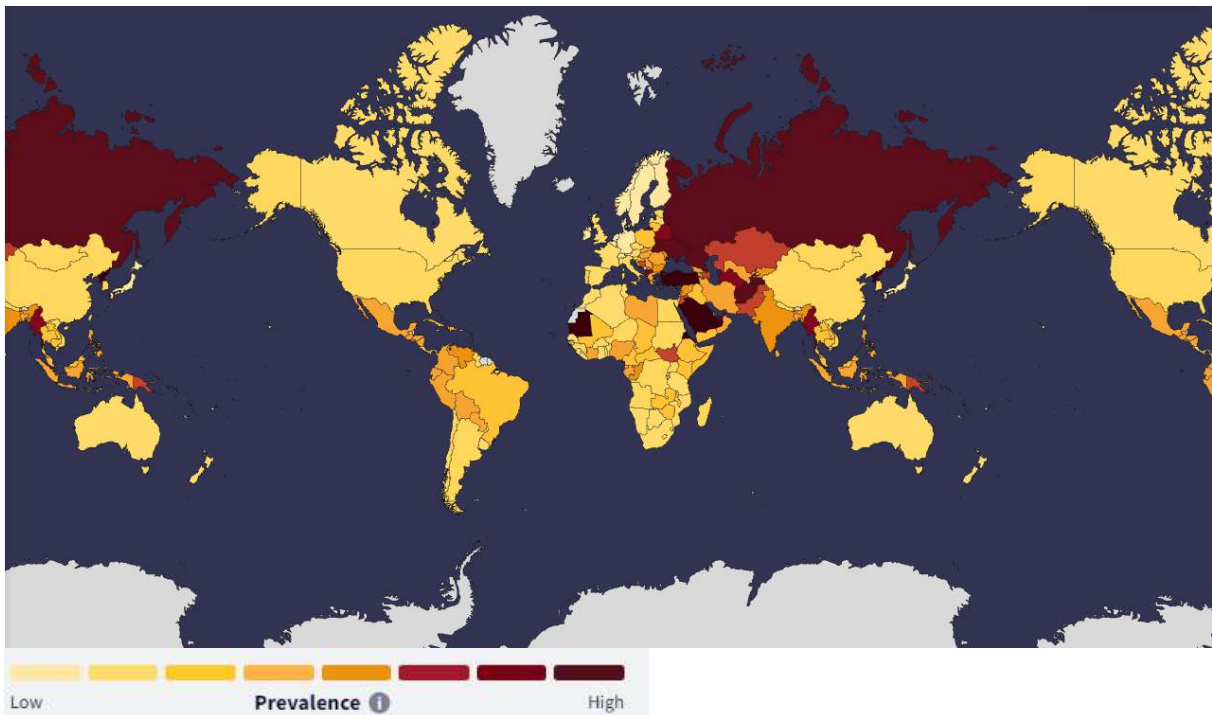


Modern Slavery and Human Trafficking Statement 2022-2023



Introduction

This statement is made on behalf of Mills & Reeve LLP and its subsidiaries, M&R Trust Corporation and M&R Secretarial Services (together, "Mills & Reeve"), in accordance with Section 54(1) of the Modern Slavery Act 2015 for the financial year 1 June 2022 to 31 May 2023. References to "we", "us" and "our" are to Mills & Reeve as defined above.

Mills & Reeve is committed to ensuring that there is no slavery or human trafficking in any part of our business or in our supply chains. This statement sets out our current risk analysis and policies, and the steps that Mills & Reeve has taken to deliver on our commitment, to safeguard against modern slavery in our organisation and through our suppliers.

Organisational structure of our business

Mills & Reeve operates as a limited liability partnership registered in England and Wales (registered number OC326165) and is authorised and regulated by the Solicitors Regulation Authority (SRA number 464604) to provide legal services. Mills & Reeve has 165 partners and 1157 employees and consultants nationwide and operates from offices in Birmingham, Cambridge, Leeds, London, Manchester, Norwich and Oxford.

Our employees

Within our business we have a low level of migrant labour. With the exception of apprentices (who are all paid over the minimum apprentice level) and interns, all staff are paid at or above the Living Wage Foundation rate. We also ensure that our suppliers are paying the living wage and we refuse to work with those that do not. We are proud to say that we meet the criteria to apply for the Living Wage Accreditation and we will commence the process in the next few months. The standard terms and conditions of employment for all of our staff provide for the freedom of the employee to terminate their employment at any time, and state that any overtime is by agreement between Mills & Reeve and the employee.

Mills & Reeve is an inclusive employer, offering flexibility on work and home life balance. We offer wellbeing support for all our staff through our Diversity, Inclusion and Wellbeing programme, managed by a dedicated team of experienced Diversity, Inclusion & Wellbeing professionals. As a business we address mental, physical, financial and digital wellbeing within our wellbeing programme. Support includes regular wellbeing catch ups, support from our Mental Health First Aiders (Wellbeing supporters) and an Employee Assistance Programme, and providing a range of webinars covering issues such as mental wellbeing, financial wellbeing, bereavement and domestic abuse.

We are very proud to have been listed for the last 20 years in The Best Companies To Work For list (link [here](#)).

We carry out regular employee satisfaction and pulse surveys. Our last employee satisfaction survey (in May 2021) found that we continue to have exceptionally high levels of employee engagement, with 97% of our employees responding they would recommend Mills & Reeve as a good place to work. 91% of our employees said Mills & Reeve genuinely cared about their wellbeing, and 86% of our employees said they felt valued for the work that they do. Our next employee survey will take place around May 2023.

In 2020, Mills & Reeve signed up to the Mindful Business Charter and we are fully committed to ensuring that the wellbeing of our staff and partners remains a priority, while still providing an excellent service to our clients.

We are also signatories to the Mental Health at Work Commitment, further enhancing our commitment to the wellbeing of our people. Our 2021-25 Diversity, Inclusion and Wellbeing strategy further demonstrates our commitment to continue enhancing our wellbeing practice.

Our supply chains

Mills & Reeve is a responsible business which is committed to acting with integrity and maintaining the highest professional and ethical standards in all our business relationships, including our supplier relationships. Mills & Reeve has a zero-tolerance policy towards slavery and human trafficking, and we require our suppliers to take the same approach.

Mills & Reeve's Procurement Policy mandates that everyone responsible for buying goods and services for the business is expected to observe the highest standards of honesty and fairness, and work in a manner which ensures full accountability, consistent with our [Core Values](#). We are committed to acting ethically, with integrity and transparency, and have policies and processes in place to safeguard against any form of modern slavery taking place within our supply chain:

- We identify and assess potential risk areas in our supply chains.
- We require that all of Mills & Reeve's suppliers comply with the Modern Slavery Act 2015 and are transparent, accountable, auditable and free of modern slavery and trafficked labour.
- We operate and maintain a preferred supplier list, conducting extra due diligence on suppliers where we perceive there to be a greater risk of slavery and human trafficking, in alignment with the Chartered Institute of Procurement & Supply (CIPS) guidance.
- Our standard terms and conditions of purchase include appropriate contractual provisions to ensure that our suppliers are contractually committed to seeking to avoid the use of slave labour and trafficked labour.

All members of our procurement team have attained and are required to maintain their CIPS Ethical Procurement certificate and actively seek opportunities to source suppliers who pay the Living Wage Foundation rate.

As part of our ongoing risk mitigation, we will:

- Act promptly where a compliance breach has been identified or flagged.
- Continue to feedback lessons learnt into the compliance risk management process.

Our risk assessment

On the basis of the due diligence and analysis of the Mills & Reeve business and our supply chains carried out to date, we consider that Mills & Reeve is currently at a low risk of modern slavery and human trafficking in both the context of our own business and our supply chains.

We use EcoVadis, a globally recognised assessment platform, to rate our business' sustainability. This year we completed two assessments and maintained our position in the top 25% companies. The most recent assessment identified six areas of improvements in the "Labour" and "Human Rights" sections, and we are currently working on those before our next assessment in December 2023. Our scorecard is available to view upon request.

Our policies

This year we have joined the UN Global Compact, the largest corporate sustainability initiative, with the aim to uphold our basic responsibilities to people and the planet by incorporating into our strategy their [Ten Principles](#) which focus on Human Rights, Labour, Environment, and Anti-Corruption.

In addition to our [Core Values](#) which guide how we work at Mills & Reeve, we also have the following policies published on our Intranet (which is accessible by all employees):

- Procurement Policy: Ensures that modern slavery risks are identified within the procurement process.
- Whistleblowing policy: protecting whistleblowers through our confidential reporting process.

- Harassment policy and guidance for employees prohibiting harassment and intimidation.
- Disciplinary policy: prohibiting any threat of violence.
- Safeguarding policy: protecting from harm and promoting the wellbeing of young people and vulnerable adults.
- Equality, Equity, Diversity and Inclusion policy: supporting our commitment to wellbeing in our practice.
- Health and Safety policy: providing a safe environment to our staff.

Mills & Reeve also works with clients to raise the profile of the issue of modern slavery and human trafficking, and to advise on implementing modern slavery compliance programmes. The team will write or contribute to articles on issues around modern slavery, particularly in the context of supply chains (see [Protecting reputation - why understanding your supply chain is so important - July 2021](#) and [Coronavirus series: building a thriving supply chain - July 2021](#)).

Our due diligence

The procedures set out in this Statement are intended to reduce the risk of slavery and human trafficking occurring in our business and supply chains, and to enable us to monitor potential risk areas in our business and supply chains.

We will continue to monitor our due diligence on our suppliers by reviewing our supplier questionnaire against CIPS ethical guidance, to ensure our suppliers have robust policies and procedures regarding the Modern Slavery Act 2015. Our supplier questionnaire includes questions related to inclusion, diversity and wellbeing. Additionally, we have reviewed our ESG criteria and included modern slavery related questions to our new ESG questionnaire for suppliers.

We will prioritise suppliers within the selection process that can demonstrate they behave in a manner that is consistent with our [Core Values](#).

Our training / How we address risks of modern slavery

In addition to Mills & Reeve's policies set out above, training on modern slavery issues is mandatory for our procurement team, and business support directors who approve purchase orders for goods and services to Mills & Reeve are required to undertake more advanced modern slavery training. Training is also available to those sections of the

business directly involved in drafting supply chain type contracts, where modern slavery needs to be taken into account (for example, corporate, commercial, IP, IT, and construction).

Since 2021, all staff members have access to Modern Slavery training courses through our 'Learning Hub.' This includes modern slavery awareness training delivered by the Slave Free Alliance with the objective to raise awareness levels of the issues around modern slavery. This ensures our employees have a greater understanding of the risks and indicator signs of modern slavery.

We hosted an event in partnership with Unseen, a UK charity supporting survivors of trafficking and modern slavery, bringing a number of businesses from across the West Midlands to hear about the support Unseen can offer to businesses. We have also promoted the Unseen App to all our employees so they are able to recognise and understand how they can report victims of modern slavery.

Declaration – our supply chain goals for this year

In the next 12 months:

- We will review our Procurement Policy (estimated completion 1 April 2024) to ensure we take a proportionate, risk-based approach to our supply chain.
- We will be producing our annual communication and progress to show our commitment to the UN Global Compact.
- We will deploy our new supplier portal (estimated completion 1 June 2024) to enable us to collate information on the ESG credentials of our most critical suppliers.

This statement has been approved and signed off by the Board on behalf of Mills & Reeve on 28 November 2023.

Signature:

A handwritten signature in dark ink, appearing to read 'Charles Staveley', written in a cursive style.

Charles Staveley, Senior Partner
On behalf of Mills & Reeve LLP