

Modern Slavery and Human Trafficking Statement 2024-2025

Introduction

This statement is made on behalf of Mills & Reeve LLP and its subsidiaries, Mills & Reeve Trust Corporation Limited, Mills & Reeve Services Limited and M&R Secretarial Services Limited (together, "Mills & Reeve"), in accordance with Section 54(1) of the Modern Slavery Act 2015 for the financial year 1 June 2024 to 31 May 2025. 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 181 partners and 1289 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 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 an accredited Living Wage employer (link [here](#)). This means all staff, directly employed by us, are paid a living wage.

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. Our support is structured around four pillars of wellbeing: mental, physical, financial, and digital. This includes resources such as wellbeing supporters who serve as mental health first aiders, wellbeing rooms, an Employee Assistance Programme, regular webinars and talks, and weekly online fitness classes. Additionally, we have launched an online financial wellbeing hub which directs colleagues to a range of financial wellbeing support, coaching, resources and education through our partners at HSBC, Scottish Widows, & Octopus Money.

This year, employees voted in the Sunday Times' Best Places to Work 2025 survey, and we are delighted to have been named in the Sunday Times' list of the 115 Best Big Places to Work For ([here](#)). The results highlighted that 90% of our people feel safe and happy at work. As a firm, we were praised for fostering a supportive environment, with employees noting inclusive leadership and hybrid working as our top-performing areas.

We carry out regular employee satisfaction and pulse surveys. Our last employee satisfaction survey (in May 2023) found that we continue to have exceptionally high levels of employee engagement, with 99% of our employees responding they would recommend Mills & Reeve as a good place to work. 89% of our employees said Mills & Reeve genuinely cared about their wellbeing, and 87% of our employees said they felt valued for the work that they do. Our most recent employee survey took place in September 2025, with results due to be published in December 2025.

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 proud to be signatories to the Mental Health at Work Commitment, further reinforcing our dedication to the wellbeing of our people. Our 2030 Strategy, along with our diversity, inclusion & wellbeing objectives, demonstrates our ongoing commitment to continuously improving 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 Walk Free Global Slavery Index.
- 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.
- We have recently implemented Risk Ledger, a third-party risk management platform, with an initial focus on our higher-risk suppliers. Over the coming year, we will expand its use across a broader group of new and existing suppliers. This will strengthen our supply chain mapping beyond Tier 1 suppliers, help us identify modern slavery risks earlier, and enhance our compliance reporting.

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 evaluate our business' sustainability. This year, we retained our silver rating and still remain in the top 15% of assessed businesses.

Since 2021, we have seen consistent year-on-year improvements in our Labour and Human Rights scores, where we are benchmarked against our peers in the legal sector. Our performance in response and corrective actions have progressed from "Good" to "Advanced," as reflected in EcoVadis' feedback: *"The company demonstrates an advanced management system on labour & human rights issues."*

Our scorecard is available to view upon request.

Our policies

This year we have continued to be an active member of 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 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

We also work closely with clients to raise awareness of modern slavery and human trafficking, and to advise on implementing effective compliance programmes. Lawyers across the firm regularly contribute to articles on issues around modern slavery, particularly in the context of supply chains and sector-specific risks (see [Modern Slavery within the care sector – December 2024](#) and [UK Government Guidance on the Modern Slavery Act – Transparency in Supply Chains – January 2025](#)). For more information, clients can visit our dedicated [Modern Slavery Act 2015 page](#), which outlines our expertise and approach to supply chain compliance.

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 in our 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 have enhanced our Responsible Business training for all staff. In addition to the mandatory modules required to meet our various ISO standards, we now offer access to a range of free learning resources through our membership with the UN Global Compact initiative.

Courses available on this platform cover topics such as Business and Human Rights, Human Rights Due Diligence, and how our business can support the advancement of the UN's Sustainable Development Goals (SDGs).

Declaration – our supply chain goals for this year

In the next 12 months:

- We will update our supplier due diligence questionnaire to reflect the latest CIPS ethical guidance and include enhanced ESG criteria, with a particular focus on modern slavery, inclusion, diversity, and wellbeing.
- We will prioritise supplier engagement and training, offering targeted resources and guidance to help suppliers understand and meet their obligations under the Modern Slavery Act 2015.
- We will expand our use of Risk Ledger across a broader supplier base to strengthen supply chain visibility and proactively manage third-party risks.

This statement has been approved and signed off by the Board on behalf of Mills & Reeve on 26/11/25 .

Signature: 

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