

Modern slavery and human trafficking statement

This statement is pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for fiscal year ending 30 April 2023.

In this statement use of the term “**modern slavery**” is intended to reference the term “slavery and human trafficking” used in section 54 of the Modern Slavery Act 2015 and includes reference to (without limitation) slavery, servitude, forced or compulsory labour, exploitation of children, human trafficking and committing an offence with intent to commit human trafficking (including aiding, abetting, counselling or procuring a human trafficking offence).

Our commitment

Weightmans has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

We are an accredited real Living Wage employer. This is a voluntary initiative to pay an hourly wage that is higher than the statutory minimum wage and is based on the actual cost of living. The rates are calculated annually by the Resolution Foundation and overseen by the Living Wage Commission, and are based on the best available evidence about living standards in London and the UK.

We operate systems as part of our procurement processes to seek to identify, assess and monitor potential risk areas in our supply chains; to mitigate the risk of slavery and human trafficking occurring in our supply chain and to protect whistle-blowers.

Our structure

The firm is a top 40 UK professional services firm with offices in Birmingham, Cardiff, Glasgow, Leeds, Leicester, Liverpool, London, Manchester and Newcastle. We are a provider of legal and non-legal services to individuals, commercial, insurance and public sector clients. The firm operates in England and Scotland as a limited liability partnership incorporated in England together with an affiliate limited liability partnership under common ownership, incorporated in Scotland, and on 30 April 2023 had a headcount of 1,465 people, including members and employees.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

To seek to ensure that all parts of our business and supply chains are free of modern slavery, we have put in place a designated Modern Slavery Policy (a summary of which can be located at <https://www.weightmans.com/media/gfmmvcex/modern-slavery-policy-summary.pdf>). This complements our Business Ethics Policy and our Whistleblowing Policy, both of which further demonstrate our stance on unethical and inappropriate behaviour.

Our Modern Slavery Act team

This statement, together with our Modern Slavery Policy and the other policies referred to above, demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains or within our own business.

We have established a team to oversee the firm's activities towards the implementation and enforcement of our Modern Slavery Policy. The team includes our General Counsel, Legal Counsel, Contracts Manager, Environmental, Social and Governance Manager, and Head of HR, together with representatives from our audit and compliance team and HR. The Modern Slavery Team meets quarterly and reports to the firm's executive management board ("**Board**"), ensuring that decisions required rest with those at the highest tier within the business.

On entering the fiscal year beginning 1 May 2023, we have committed to expanding our Modern Slavery Act team, with additional recruitment being made to support our Legal Counsel and Contracts Manager.

Due Diligence

Suppliers

We require our suppliers to observe a tender process pre-contract and at contract renewal. Our Contracts Manager, supported by two Assistant Contracts Managers, our Legal Counsel and the Assistant Legal Counsel, oversees a process of due diligence undertaken with new and existing suppliers to seek to ensure that each supplier meets our standard contractual requirements.

As part of our procurement process and general risk assessment, we give positive weight to those suppliers who have an anti-slavery policy for our review. To aid us in carrying out a risk assessment on each prospective supplier we have adopted a supplier management tool which assists in automatically scoring supplier responses and highlighting areas of concern based on the supplier's responses to our pre-contract enquiries. Where areas of concern are identified we seek to work with the prospective supplier to help them provide further evidence with the aim to help alleviate the concerns and rectify any non-conformance prior to the relationship proceeding.

We ask all prospective suppliers to sign up to our supplier management code of conduct and supplemental clauses ("**Model Clauses**"). Our Model Clauses impose obligations on suppliers consistent with our policies and commitment including in respect of our approach around modern slavery. The Model Clauses often supplement the suppliers' own terms and conditions. The Model Clauses include obligations on the supplier:

- not to engage in slavery or human trafficking;
- to comply with the Modern Slavery Act 2015;
- (where applicable) to comply with its own Modern Slavery Policy and Modern Slavery Statement;
- to warrant that none of its personnel has engaged in any modern slavery offence;
- to the extent commercially practicable, to require that its own suppliers do not engage in slavery or human trafficking; and
- to notify us of any breach of the above.

A failure to comply entitles us to terminate the contract unless the supplier satisfies us that it has taken steps to avoid a re-occurrence of the breach. A notification of breach and an explanation of the action taken in response to a breach, will inform our decision to renew the supply contract.

If a Supplier does not sign up to our Model Clauses, we ask them to demonstrate that they have policies in place, commensurate to our own. Additionally, over the next 12 months, a review of our Model Clauses is taking place to try to ensure that they are increasingly accessible to our suppliers, to encourage the number of suppliers who are able to commit to them.

During the 12 months to 30 April 2023, we have not received any notifications of breach or incidence of Modern Slavery. In addition we have sought to apply greater rigour to seek to achieve full compliance with our policies and procedures by undertaking an internal audit of our suppliers to ensure that all suppliers are subject to the due diligence process with any non-conformance challenged with the supplier. A rolling annual, audit programme of suppliers is in operation, where suppliers are questioned on various topics, including modern slavery.

Clients

We are a supplier of services to our clients, many of which require sight of our own Modern Slavery Policy as a condition of contract award/renewal.

Clients have imposed on us modern slavery obligations like those that we are seeking to impose on our own suppliers.

Compliance with such obligations is challenging, at least to the extent that they require us to influence the behaviour of our own suppliers. We view this however as an additional incentive to impose the Model Clauses and, in the face of breach, to terminate supply arrangements where it is commercially practicable for us to do so.

Risk assessment and management

We have assessed the risk of modern slavery within our business to be low.

To assess and manage our risk of modern slavery, our Contracts Management team are conducting a gap analysis of the ISO 20400 guidelines for sustainable procurement. This review will enable us to examine our current processes against industry best practice.

To better assess the risks that suppliers pose on our business, we have added more detail to our Pre-Qualification Questionnaire (PQQ). Additionally, when someone in the firm requests we conduct our PQQ process on a potential supplier, they are empowered to make that request through a digital ticketing system. The system has been implemented to increase buy-in from staff within the firm, to ensure that Contracts Management can properly manage the risk of a supplier from the earliest possible opportunity.

Key Performance Indicators (KPIs)

Engagement with EcoVadis

Weightmans has engaged EcoVadis to assess the firm's sustainability. EcoVadis' assessment is split into Environment, Labour & Human Rights, Ethics and Sustainable Procurement. We have been awarded a silver sustainability rating, achieving an overall score of 69.

The themes most relevant to modern slavery are Labour & Human Rights and Sustainable Procurement, in which we scored 80 and 50, respectively.

The EcoVadis scores provide us with a baseline for which we can seek to improve in future EcoVadis assessments.

UN Global Compact initiative:

Weightmans has joined the UN Global Compact initiative. This is a voluntary leadership platform for the development, implementation, and disclosure of responsible business practices. The UN Global Compact is a call to companies to align their operations with ten principles and the Sustainable Development Goals.

We are required to submit an annual Communication on Progress (COP) that describes our efforts to implement the ten principles. Four principles are particularly relevant to modern slavery, these are:

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.
- Principle 2: Make sure that they are not complicit in human rights abuses.
- Principle 4: (Businesses should uphold) the elimination of all forms of forced and compulsory labour.
- Principle 5: (Businesses should uphold) the effective abolition of child labour.

Our annual COP submission will demonstrate our commitment to compliance with these principles.

Local suppliers

We have agreed a definition of 'local' as being "UK owned suppliers", in order to categorise our local suppliers. We will monitor the percentage of products and services purchased locally on an annual basis, to use as a benchmark for future years.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide annual training to our staff. Topics of training include Modern Slavery Act, Governance and Ethics and introduction to ESG.

Approval

Approved by the members of Weightmans LLP acting by the Board under delegated authority on 20 October 2023.

John Schorah
Designated Member and Managing Partner
For and on behalf of Weightmans LLP