

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 31 March 2024.

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 have been certified as Top Employers by the Top Employers Institute in the UK for the 17th year in a row, once again entering the top ten rankings in 2024. The Top Employers Institute is the largest certification company on HR best practices in organisations around the world. The body recognises and celebrates outstanding people-centric policies and practices that have created positive workplace environments around the world. The assessment is based on the results of a HR Best Practices Survey, which covers six HR domains and twenty individual topics, including people strategy, work environment, talent acquisition, learning, diversity, equity & inclusion and wellbeing.

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 31 March 2024 had a headcount of 1554 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. 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.

Fulfilling the commitment made in last year's modern slavery statement, we have expanded our Modern Slavery Act team to support our Legal Counsel and Contract Manager.

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 specific anti-slavery and human trafficking contractual clauses. 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.

Out of the portfolio of suppliers we are currently monitoring, 77% have gone through our PQQ process and 75% have signed our Model Clauses. 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, however we are striving to encourage the number of suppliers who are able to commit to our Model Clauses.

Annually we conduct further due diligence in the form of a rolling audit programme of suppliers, where suppliers are questioned on various topics, including modern slavery.

A failure to comply with our Model Clauses entitles us to terminate the contract unless the supplier satisfies us that it has taken steps to avoid a re-occurrence of the breach. In any instance of notification of breach or suspected breach or incidence of modern slavery or human trafficking in our supply chain, we will investigate and, if substantiated, engage in remediation processes as appropriate, ultimately informing our decision to renew the supply contract.

We are pleased to report that we monitor and require notification of breach or incidence of Modern Slavery and have never received any notifications.

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

As a regulated professional services organisation, we have assessed the overall risk of modern slavery within our business to be low.

To assess and manage our risk of modern slavery, our Contracts Management team are looking to map our suppliers to the sustainable development goals, set by the UN Global Compact Initiative. This will allow us to understand in more detail the degree of modern slavery risk in our organisation and examine our current processes to implement any corrective actions. We consult the ISO 20400 guidelines for sustainable procurement and as far as applicable, our policies take the guidance into account.

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.

Our PQQ integrates Modern Slavery to monitor and review indicators of relevance to its effectiveness at preventing slavery and human trafficking in our supply chains. Our PQQ includes, but is not limited to the following questions:

- the organisation's compliance with the Modern Slavery Act 2015;
- whether the supplier is required to publish a Modern Slavery and Human Trafficking Statement, requesting a copy of the Statement if applicable; and
- whether the supplier has become aware of a breach of the Modern slavery Act within either their business or supply chain during the previous twelve-month period.

When onboarding suppliers, our PQQ also gathers information in relation to Equality, Diversity and Pay. We assess each supplier in this respect, including, but not limited to the following criteria:

- whether the supplier pays all employees the minimum Real Living Wage as per the Living Wage Foundation;
- does the supplier employ any people outside of the UK, if so, are they paid a local equivalent living wage;
- that the supplier complies with the applicable Employment legislation in all jurisdictions in which they operate; and
- whether the supplier monitors environmental and social impact within their supply chain.

When assessing suppliers at the PQQ stage, we also require potential suppliers to address Environmental questions, including the following:

- whether the supplier has undertaken an environmental risk assessment and produced an action plan to manage those risks;
- does the supplier regularly monitor their operations to ensure they are compliant with any relevant environmental legislation; and
- does the supplier publish an ESG or Sustainability report, requesting a copy of the report if applicable.

We continue to review our approach and prefer to work with suppliers who are aligned to our policies and practices regarding ethical and sustainable procurement. To ensure commitment to the completion of our PQQ, we are constantly exploring ways that we can make it easier and simpler for suppliers to engage with our processes.

We are in discussion with a third-party provider and this year we are planning to automate our PQQ and rolling annual audit of suppliers. We will require suppliers to complete these questions directly through the platform, enabling further due diligence in the procurement process and allowing us to widen the scope of our supply chain reviews.

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 received the highest

Platinum rating by EcoVadis, achieving an overall score of 80, positioning us in the UK's top 1% of legal and accounting businesses for ESG/sustainability performance and processes. This ranking recognises the work we are doing in our ambition to be one of the UK's most socially and environmentally conscious law firms.

The themes most relevant to modern slavery are Labour & Human Rights and Sustainable Procurement, in which we scored 80 and 70, respectively. The EcoVadis scores provide us with a baseline for which we can assess our key suppliers and seek to improve in future EcoVadis assessments.

UN Global Compact initiative

Weightmans has joined the UN Global Compact initiative that is a call to companies to align their operations with ten principles and the Sustainable Development Goals.

As part of our active membership, 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 demonstrates 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. The training acts as a reminder of what constitutes modern slavery and provides warning signs to be alert to, to ensure modern slavery has no place in our organisation.

Approval

Approved by the members of Weightmans LLP acting by the Board under delegated authority on 30 September 2024.



John Schorah

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