

**April 2025**

Section 54(1) of the Modern Slavery Act 2015 (the “**Act**”) requires any commercial organisation in any sector, which supplies goods or services, and carries on a business or part of a business in the United Kingdom, and is above a specified total turnover, to produce an annual slavery and human trafficking statement to be approved by their board and published on their website.

We are committed to the prevention of the use of forced labour and has a zero-tolerance policy against human trafficking and slavery. This statement relates to the actions and activities of **Clarke Willmott** during the financial year ending March 2025.

## **Our organisation**

We are a national law firm with seven offices across England and Wales (registered number OC344818), which provides a broad spectrum of legal services for businesses and individuals. We employ over 600 lawyers and support staff.

We pride ourselves on providing the best service for our clients. To do so we act with integrity and fairness. **Clarke Willmott** and our staff are committed to eradicating the threat of human trafficking and slavery where possible and we would expect no less of our clients or the suppliers we use.

## **Our policies**

We will not use or allow the use of forced compulsory labour, slavery, servitude, or human trafficking in the course of its business. This includes sexual exploitation, securing services by force, threats or deception and securing services from children and vulnerable persons.

Our employment procedures guarantee that **we** conduct appropriate checks on all staff to ensure they can legally work in the United Kingdom. In addition, all internal policies are reviewed at least annually to ensure continued compliance with the Act. The following policies are relevant to the prevention of slavery and human trafficking in its operations:

### **Procurement and outsourcing policies**

These establish that we will continue to comply with the Act in respect of our relationship with all our suppliers. To operate successfully, we may acquire goods or services from third-party sources. Our supplier agreements include modern slavery clauses which the supplier must agree to before work is carried out.

### **Environmental, Social and Governance Policy**

This policy is designed to ensure that we are conducting its business responsibly. We devote considerable resources to various initiatives which have a positive impact on the community which we live and the wider environment.

### **Whistleblowing Policy**

We encourage all our employees to report any concerns related to the activities of the firm. Our 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. Additionally, the policy guarantees that no one will be victimised for raising a matter under this procedure.

## Recruitment Policy

This confirms that we will conduct checks on all staff to safeguard that they can legally work in the United Kingdom.

## Employment contracts

These include a clause confirming that the employee will comply with our Modern Slavery and Trafficking Policy and any related procedures.

The advice of the National Crime Agency's Indicators of Modern Slavery and Human Trafficking in the Legal Sector is that some practice areas risk being exposed to human trafficking and slavery crimes. All staff at **Clarke Willmott** receive training on our policies and any reported concerns will be dealt with in a swift and effective manner.

## Supplier adherence to our values

We have continued our efforts from 2024 to ensure all our suppliers incorporate and maintain their compliance with our policies on human trafficking and slavery.

Part of our procurement process requires any new supplier complete our questionnaire to ensure we are satisfied with their commitment to preventing human trafficking and slavery mirrors that of ours. This process will ensure suppliers:

- comply with the requirements of the Act (or equivalent);
- provide us with a copy of the supplier's policy;
- provide us with a copy of the supplier's modern slavery statement and confirmation of how and where this has been published; and
- provide confirmation as to whether the supplier has ever been prosecuted for an offence pursuant to the Act (or equivalent).

Prior to the formation of any contract with our suppliers, we add our own modern slavery clauses which ensure:

- neither the supplier nor any of its officers, employees, agents or subcontractors have:
  - a) committed an offence under the Act;
  - b) been notified it is subject to investigations relating to an alleged breach under the Act;or
  - c) is aware of any circumstances within its supply chain which could give rise to an investigation or prosecution under the Act.
- the supplier complies with the Act;

- we will be immediately notified should the supplier have reason to believe failure of any of its requirements; and
- breach of supplier compliance will entitle us to terminate the contract.

Through this, we are satisfied that our current suppliers make sufficient effort to ensure they do not have any involvement with human trafficking and slavery. Our suppliers also assure us they continue to screen their own suppliers to ensure compliance with the Act.

If any responses are deemed unsatisfactory, our continued relationship with them will be determined by our Audit and Risk Committee. Similar assessments are carried out when considering the slavery and human trafficking risks of each new service supplier.

Our firm-wide procurement process has been maintained to reflect our commitment to preventing human trafficking and slavery. Our procurement process ensures that, despite the size and complexity of our supplier needs, sufficient due diligence is carried out on all our prospective suppliers, no matter the size or relationship.

It is possible that allegations of human trafficking and slavery may be made, most likely, by whistle-blowers. If allegations do emerge, we will comprehensively investigate any allegations that an outsourced service supplier is partaking in slavery or human trafficking. This investigation would be supervised by our Audit and Risk Committee.

Our Risk Management and Compliance team continue to monitor and improve, where necessary, all our policies which are relevant to the prevention of slavery and human trafficking.

### Training

All management and staff undergo training regarding our policies to ensure that all employees understand our shared values and comply with our statutory obligations including those set out in the Act. We maintain a live database of all policies, which staff can readily access on our intranet. Our Risk Management and Compliance team are tasked with ensuring our policies are maintained and updated on a regular basis and all members are responsible for ensuring that all members of staff adhere to our values, standards and obligations.

We continue to circulate, annually, a copy of this statement to all employees.

### Our wider commitment to preventing modern slavery and human trafficking

We have previously supported Unseen, a charity which raises awareness of modern slavery and human trafficking. We are proud of our relationship with Unseen and learned from the valuable work that they do.

We pledged to work with Llamau (the chosen charity for the Cardiff office) in 2021 and again in 2025. Llamau supports young people and women experiencing homelessness. Quite often, as a result of slavery and human trafficking, young people and women can find themselves alone, without a support system, in an unfamiliar country. Due to the COVID-19 pandemic, we extended the support for this charity through the 2022/2023 financial year, with support coming to an end on 30 April 2023. Our community strategy for the current financial year focuses on improving social mobility and we have

partnered with the Social Mobility Foundation. Each of our seven offices also chooses to work with a local charity to support social mobility in the local area.

### Key performance indicators

The key performance indicators (“**KPIs**”) will be that the responses from all current and future suppliers are satisfactory and continue to be satisfactory with regards to their efforts made to avoid human trafficking and slavery and adherence to the Act. Training records will be kept ensuring all existing and new staff members are up to date, and the central register will be reviewed quarterly. We are confident that through our process staff understand the signs attributed with modern slavery as well as the process and their key contacts in the event they wish to raise any concern.

This statement will be reviewed annually. The next review is due March 2026.



**Peter Swinburn**  
Chief Executive