

## Modern Slavery Transparency Statement 2025

We are guided by our brand values: smart, bold and together. It is in our culture to care about people, act decently and always do the right thing. This means having zero-tolerance to modern day slavery and human trafficking in our firm and supply chain.

This statement is made on behalf of Freeths LLP pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

### **Our Structure and Supply Chain**

As a law firm, Freeths provides legal advice to private and commercial clients in the public and private sectors across the UK. We have 13 offices and a total complement of circa 1,200 people, including circa 170 partners. For the financial year ended 31 March 2025 our turnover was £166.8m.

As a professional services business, Freeths predominantly employs professionally qualified and highly skilled people. We want Freeths to be a dynamic, inclusive and rewarding place to work for all our employees and partners; our Equity, Diversity and Inclusion (EDI) Strategy sets out a roadmap for achieving this. We are proud of our ongoing programme to support the health and wellbeing of our people, which includes free access to our Employee Assistance Programme, an online GP service, a structured Promotion Pathway, an extensive wellbeing programme and many employee benefits, which are enhanced beyond the statutory minimum. To ensure legal compliance, we have a robust vetting process for all new employees, which includes a review of their legal right to work in the UK.

Our supply chain spans a range of services, including technology, facilities, and professional recruitment. We are committed to preventing modern slavery across our entire supply chain, with particular vigilance in higher-risk areas such as facilities management.

### **Anti-slavery & Human Trafficking Policy**

We have a zero-tolerance approach to modern slavery and human trafficking. Our standalone Anti-slavery and Human Trafficking Policy reflects our commitment to implementing and enforcing effective practices and controls to seek to ensure modern slavery is not taking place in our firm or supply chain. Underpinning this policy is a suite of policies and provisions that reinforces our commitment to the identification and prevention of modern slavery.

We list below some of the relevant policies and provisions:

- Our Whistleblowing Policy enables our staff to confidentially report any concerns relating to modern slavery, human trafficking or human rights violations and to give assurance that these concerns will be dealt with appropriately. This includes matters pertaining to our supply chain, which would include modern slavery.
- Our 'Work in Confidence' app provides a confidential channel to discuss or report concerns and again this could include concerns linked to modern slavery or human trafficking.
- Our EDI Policy encourages all our staff and partners to value diversity and respect each person's individuality, and to ensure that no partner, employee, agency worker, contractor, self-employed consultant, job applicant, ex-employee, client or third party receives less favourable treatment based on their colour, race, nationality, ethnic or national origins, sexuality or gender, disability, age, background or religion or belief.
- Our Anti-bribery Policy and training programme set out the firm's rules and what is expected of our employees, partners, contractors, and third-party service providers in relation to all dealings on our behalf.

We seek to actively foster a culture of openness and inclusivity. In addition to our whistleblowing mechanisms, we encourage dialogue through grievance procedures, our Staff Council, employee forums, intranet channels, and regular leadership listening sessions – ensuring all voices are heard.

## **Governance and Oversight**

Freeths has a well-defined governance structure, designed to ensure accountability, transparency, and effective oversight.

Our Responsible Business Committee, a sub-committee to the Management Board, oversees our impact as a Responsible Business in relation to our colleagues, communities, climate and clients, and in 2025 we appointed our first Director of Responsible Business to further develop our approach in this area. The Responsible Business Committee includes the firm's Senior Partner, Chair of the Management Board, COO, COLP and Chief People Officer.

The firm's Management Board is responsible for the firm's purpose, mission, strategy, values and policies, financial performance, risk management, and compliance.

Our Operations Board is comprised of Heads of Business Support Teams, working alongside Department Heads and Office Managing Partners to embed risk management and compliance throughout the business.

Other relevant committees such as the Executive Committee and Premises Committee report to the Management Board.

We also operate a Regulatory Compliance System: each business department has its own compliance team, responsible for managing operational compliance and identifying and assessing risks in line with applicable laws and regulations. This ensures a strong "three lines of defence" model of ownership, oversight, and assurance.

We are proud that our governance and risk frameworks are underpinned by internationally recognised standards, including ISO 9001 (Quality Management), ISO 27001, ISO 22301, ISO 14001 and B Corp accreditation, which reinforces our commitment to responsible business practices.

Looking ahead, we are implementing a new Enterprise Risk Management (ERM) system as part of our five-year strategic plan. This will include a defined set of ERM policies and processes to strengthen our resilience, improve how we manage significant risks and crises, and enhance transparency and accountability across the business.

## **Supplier Due Diligence and Risk Assessment**

We are committed to improving our practices to enable us to identify and eradicate any modern slavery or human trafficking within our supply chain. Our Supplier Code of Conduct places emphasis on compliance with Freeths' core values and the prevention of modern slavery and human trafficking, and it is a requirement that all suppliers demonstrate their commitment to this.

In relation to new suppliers, all new material supplier contracts require approval in accordance with a formal authorisation policy. This safeguards our risk-based approach to supplier management and enables us to establish minimum conditions that our suppliers must meet, as laid out in our Supplier Code of Conduct.

We take a risk-based approach to our supply chain management. Having identified that the management of our Facilities Services is a high-risk area, we appointed a third-party specialist supplier to manage these services. Our selection process required the supplier to commit to our Supplier Code of Conduct, demonstrate robust processes for identifying and eliminating modern slavery and human trafficking in its operations and sub-contractors, become a Real Living Wage employer and evidence excellent employment practices, including employee wellbeing policies.

Our Chief Operating Officer has primary and day-to-day responsibility in relation to our supply chain and for implementing this policy, monitoring its use and effectiveness, dealing with any queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

## **Training and Awareness Raising**

Our Anti-slavery and Human Trafficking Policy applies to all persons working for and on behalf of Freeths. All persons have an explicit responsibility for adhering to the policy. The prevention, detection, and reporting of modern slavery both within our firm and supply chain is the responsibility of all those working for us including employees, partners and third parties.

All of our colleagues (employees and partners) have been made aware of the firm's Anti-slavery and Human Trafficking Policy, which is available on the Freeths intranet for everyone to access. We are also committed to providing an annual update to all staff to remind them of their responsibilities under the Act, the training available to them and how they should raise any concerns that they may have.

We run firm-wide, compulsory training for all employees and partners to raise awareness of issues surrounding modern slavery and human trafficking and this training continues to be a requirement for new starters to the firm.

## **Further Steps**

Our Responsible Business Committee continually reviews our processes to ensure we do the right thing within our firm, in our supply chain and in our communities. Therefore, we continually monitor our procurement process and will continue to introduce specific measures to ensure our obligations under the Act are passed through our supply chain.

## **Measuring Effectiveness**

There have been no reported incidents of modern slavery or human trafficking during the financial year April 2024 to March 2025. If any concerns were to be raised, a full investigation would be carried out and appropriate action taken in accordance with our policies and procedures.

## **Responsibility and Board Approval**

The firm's Chief Operating Officer and HR Director have responsibility for overseeing the effective implementation of our Anti-slavery and Human Trafficking Policy and for the annual preparation of the Anti-slavery and Human Trafficking statement. They ensure individuals reporting to them understand and comply with our Policy.

The Chief Operating Officer reports annually to our Responsible Business Committee and to the Management (Main) Board regarding any slavery and human trafficking issues. To date, no issues have been raised.

This statement has been reviewed by the Freeths Responsible Business Committee, and the Management Board has approved the statement on behalf of our members. This statement relates to our financial year April 2024 to March 2025.

Signed:



Chris Freeston

Date: 26.09.25

Designated Member