

Modern Slavery Transparency Statement 2026

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 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 12 offices and a total complement of circa 1,260 people, including circa 180 partners. For the financial year ended 31 March 2026 our turnover was £187.6m.

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, including any issues 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 (RBC), is a sub-committee to the Executive Board, which is chaired by the Managing Partner and responsible for firmwide strategy implementation. The RBC oversees our impact as a Responsible Business in relation to our colleagues, communities, climate and clients, and includes the firm's Senior Partner, Chair of the Partnership Board, COO, COLP, Chief People Officer and Director of Responsible Business.

The RBC also prepares an annual report for the Partnership Board. The Partnership Board is responsible for:

- Approving the firm's strategy
- Providing oversight of the Executive Board;
- Overseeing risk and governance;
- Representing the interests of partners in significant decisions and safeguarding the firm's culture and values.

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.

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 27701, ISO 22301, ISO 14001 and B Corp accreditation, which reinforces our commitment to responsible business practices.

We are now rolling out a new Enterprise Risk Management (ERM) system which includes 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 we ask 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 in line with our Procurement Policy, which requires all material contracts to be approved by an appropriate individual. 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. We are also implementing a tiered approach to supply chain mapping, applying enhanced due diligence on suppliers in other sectors that may pose an increased risk of modern slavery.

Our Chief Operating Officer has primary responsibility and oversight in relation to supply chain management, and for implementing and monitoring the controls detailed above concerning modern slavery risk.

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 and how they should raise any concerns that they may have.

We run compulsory training for all new employees and partners to raise awareness of issues surrounding modern slavery and human trafficking.

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 2025 to March 2026. 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 Chief People Officer 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 to our Responsible Business Committee and to the Partnership 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 Partnership has approved the statement on behalf of our members. This statement relates to our financial year April 2025 to March 2026.

Signed:



Chris Freeston

Date: 22.07.26

Designated Member