

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. Purpose

The purpose of this policy is to set out the firm's approach in relation to the firm's compliance with the Modern Slavery Act 2015.

2. Scope

The policy applies to all employees, Members, agency workers, self-employed contractors, self-employed consultants, third party representatives or any other person working for us or on our behalf in any capacity.

3. Responsibilities

The Compliance Officer for Legal Practice (COLP) has overall responsibility for this policy

The HR Director has operational responsibility for this policy.

Ultimate responsibility for implementing the policy rests with the Members of the firm.

The Chief Executive, assisted by the HR Director, Chief Operating Officer, Clients and Markets Director, Finance Director, all other Team Leaders and Groups Chairs, is responsible for the operation of the policy. All members of the firm's workforce, including employees and Members are required to comply with the provisions of this policy and are responsible for ensuring compliance with it when undertaking their jobs or representing the firm.

4. Related documents

CMP12 Whistleblowing Policy
CMP09 Anti Bribery Policy
CMP11 Supplier Code of Conduct
HRP02 Recruitment Procedure
HRP05 Disciplinary Procedure
HRP06 Grievance Procedure

5. Affected teams

All teams

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This policy will be reviewed on a regular basis by the COLP and the date on which any amendments are made will be recorded in the footer of this policy.

About this policy

The purpose of this policy is to set out the firm's approach in relation to the firm's compliance with the Modern Slavery Act 2015.

This policy applies to all employees, Members, agency workers, self-employed contractors, self-employed consultants, third party representatives or any other person working for us or on our behalf in any capacity.

If you have any questions about this policy please do not hesitate to speak to the COLP.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. 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 and will implement and enforce effective systems and controls to manage this.

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, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

The Compliance Officer for Legal Practice (COLP) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the COLP.

Compliance with this policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager or the COLP as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or COLP or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the COLP.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the firm intranet.

Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training will be provided as necessary those within the scope of this policy.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy may face disciplinary action dealt with under the firm's Disciplinary Procedure, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.