

## **Modern Slavery Policy**

# Modern Slavery Policy

## 1 Vision and values

- 1.1 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.
- 1.2 We have 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.
- 1.3 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.

## 2 Scope of policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, partners, agency workers, seconded workers, contractors, external consultants and third-party representatives.

## 3 Responsibility for policy

- 3.1 Weightmans' Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 The day-to-day implementation of this policy, monitoring of 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 is the responsibility of:
  - 3.2.1 our Modern Slavery Committee, to the extent that the policy relates to our supply chains; and
  - 3.2.2 the partner leading our People & Knowledge Services team, to the extent that it relates to our own business.

## 4 Compliance with the policy

- 4.1 You must ensure that you read, understand and comply with this policy.
- 4.2 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.

- 4.3 You must notify your Head of Service Delivery or a member of Human Resources as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at any supplier tier at the earliest possible stage.
- 4.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your Head of Service Delivery or report it in accordance with our Whistleblowing Policy as soon as possible.
- 4.6 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, you should raise it with your Head of Service Delivery or a member of the Modern Slavery Committee.
- 4.7 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 the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.
- 4.8 From time to time we may audit our supply chains and the firm to ensure there is no evidence of slavery either in our supply chains or within our business.

## **5 Communication and awareness of this policy**

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.
- 5.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **6 Breaches of this policy**

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 7 Interaction with other workplace policies and procedures

7.1 This Modern Slavery Policy interacts with the following workplace policies. All those to whom this policy applies are encouraged to familiarise themselves with the policies detailed below.

- Whistleblowing Policy
- Business Ethics Policy

In addition, we have incorporated into our Pre-Qualification Questionnaire Process a number of questions that interrogate a potential supplier's approach to minimising the incidence of modern slavery.

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