

Modern slavery and human trafficking statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for financial year ending 30 April 2021.

Our commitment

Weightmans has 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.

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 our contractors, suppliers, and other business partners.

We operate systems as part of our procurement processes to seek to identify, assess and monitor potential risk areas in our supply chains; to mitigate the risk of slavery and human trafficking occurring in our supply chain and to protect whistleblowers.

Our structure

The firm is a provider of legal services to individuals, commercial, insurance and public sector clients. The firm operates in England and Scotland as a limited liability partnership incorporated in England together with an affiliate limited liability partnership under common ownership, incorporated in Scotland, and on 30 April 2021 had a headcount of around 1300 people, including members and employees.

Our policies on slavery and human trafficking

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.

To ensure that all parts of our business and supply chains are slavery free, we have put in place a designated Modern Slavery Policy. This complements our Business Ethics Policy and our Whistleblowing Policy, both of which further demonstrate our stance on unethical and inappropriate behaviour.

Our Modern Slavery Act team

Our Modern Slavery Policy and other policies referred to above, demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains or within our own business.

We have established a team to oversee the firm's activities towards the implementation and enforcement of our Modern Slavery Policy. Our team reports to the firm's Board, ensuring that decisions required are taken at the highest tier within the business.

Our suppliers

We require our suppliers to observe a tender process pre-contract and at contract renewal. Our Contracts Manager, supported by a Compliance Assistant and our in-house Legal Counsel, oversees a process of due diligence undertaken with new and existing suppliers to seek to ensure that each supplier meets our standard contractual requirements.

Through this process we invite prospective suppliers to confirm that they have implemented such a policy by signing up to our supplier management code of conduct and supplemental clauses ("**Model Clauses**"). As part of our procurement process, we give positive weight to those suppliers who have an anti-slavery policy for our review. We have adopted a supplier management tool which assists in automatically scoring supplier responses and highlighting areas of concern. Areas of concern are flagged as non-conformances and suppliers are invited to provide more evidence with the aim to help alleviate concern and hopefully rectify the non-conformance prior to the relationship proceeding.

All suppliers are invited to adhere to our Model Clauses which seek to impose obligations on suppliers consistent with our policies and commitment. The Model Clauses often supplement (and sit alongside) those contained in suppliers' own terms of supply. The Model Clauses include obligations on the supplier:

- to comply with the Modern Slavery Act 2015 and its own Modern Slavery Policy;
- to warrant that none of its personnel has engaged in any modern slavery offence;
- to the extent commercially practicable, to require that its own suppliers do not engage in slavery or human trafficking; and
- to notify us of any breach of the above.

A failure to comply entitles us to terminate the contract unless the supplier satisfies us that it has taken steps to avoid a re-occurrence of the breach. A notification of breach and an explanation of the action taken in response to a breach, will inform our decision to renew the supply contract.

During the 12 months to 30 April 2021, we have not received any notifications of breach or incidence of modern slavery. In addition we have sought to apply greater rigour by undertaking an internal audit of our suppliers to ensure that all suppliers have been subjected to the due diligence process and that any non-conformance is followed up with the supplier to seek to achieve full compliance with our policies and procedures. A rolling audit programme of suppliers has been introduced.

Our clients

We are a supplier of services to our clients, several whom have requested sight of our own Modern Slavery Policy as a condition of contract award/renewal.

Some clients have imposed on us modern slavery obligations like those that we are seeking to impose on our own suppliers.

Compliance with such obligations is challenging, at least to the extent that they require us to influence the behaviour of our own suppliers. We view this however as an additional incentive to impose the Model Clauses and, in the face of breach, to terminate supply arrangements where it is commercially practicable for us to do so.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide annual training to our staff.

Approval

Approved by the Board on 31 October 2021

A handwritten signature in black ink, appearing to read 'J Schorah', with a stylized, flowing script.

John Schorah

Managing Partner

For and on behalf of Weightmans LLP