

Modern slavery statement

Mills & Reeve LLP (“Mills & Reeve”) is committed to ensuring that there is no slavery or human trafficking in any part of our business or in our supply chains. This statement sets out our current risk analysis and the steps that Mills & Reeve has taken to deliver on our commitment.

Organisational structure

Mills & Reeve is a limited liability partnership registered in England and Wales (registered number OC326165) and is authorised and regulated by the Solicitors Regulation Authority (registered number 464604) to provide legal services. Mills & Reeve has 131 partners and 962 employees and consultants nationwide and operates from offices in London, Cambridge, Norwich, Birmingham, Manchester and Leeds.

Our risk analysis

On the basis of the due diligence and analysis of the Mills & Reeve business and our supply chains carried out to date, we consider that Mills & Reeve is currently at a low risk of slavery and human trafficking in both the context of our own business and our supply chains.

Our overarching policy towards slavery and human trafficking

As embodied in the firm’s [core values](#), Mills & Reeve is a responsible business which is committed to acting with integrity and maintaining the highest professional and ethical standards in all our business relationships, including our supplier relationships. Mills & Reeve has a zero-tolerance policy towards slavery and human trafficking and we require our suppliers to take a similar approach.

Our policies and procedures in relation to slavery and human trafficking

Our employees – within our business we have a low level of migrant labour. With the exception of apprentices and interns, all staff are paid at or above the Living Wage Foundation rate. The standard terms and conditions of employment for our staff provide for the freedom of the employee to terminate his or her employment at

any time, and state that any overtime is by agreement between Mills & Reeve and the employee.

We are very proud to have been listed for the last sixteen years in The Sunday Times 100 Best Companies To Work For (mid-size organisations). Indeed, we are the only law firm to have achieved this.

We carry out regular employee satisfaction surveys. Our last employee satisfaction survey (April 2019) found that our employees continue to have exceptionally high levels of employee engagement, with 97% of our employees responding that they would recommend Mills & Reeve as a good place to work. 84% of our employees said that they felt valued for the work that they do. Our next employee survey will take place in early 2021.

Mills & Reeve also has the following policies published on our Intranet (which is accessible to all employees):

- Whistleblowing policy: protecting whistleblowers through our confidential reporting process;
- Harassment policy: prohibiting harassment and intimidation; and
- Disciplinary policy: prohibiting any threat of violence.

Furthermore, Mills & Reeve has a team of lawyers who work with clients to raise the profile of the issue of modern slavery and to achieve modern slavery compliance.

Our supply chain

Mills & Reeve's Purchasing Policy mandates that everyone responsible for buying goods and services for the firm is expected to observe the highest standards of honesty and fairness, and work in a manner which ensures full accountability, consistent with the firm's [core values](#).

We are committed to acting ethically, with integrity and transparency, and have policies and processes in place to safeguard against any form of modern slavery taking place within our supply chain:

- We identify and assess potential risk areas in our supply chains;
- We require that all of Mills & Reeve's suppliers comply with the Modern Slavery Act 2015 and are transparent, accountable, auditable and free of modern slavery and trafficked labour;
- We operate and maintain a preferred supplier list, conducting extra due diligence on suppliers where we perceive there to be a greater risk of slavery and human trafficking, in alignment with the Chartered Institute of Procurement & Supply (CIPS) guidance; and

- Our standard terms and conditions of purchase include appropriate contractual provisions to ensure that our suppliers are contractually committed to seeking to avoid the use of slave labour and trafficked labour.

All members of the Procurement Team have attained and are required to maintain their CIPS Ethical Procurement certificate and actively seek opportunities to source suppliers who pay the Living Wage Foundation rate.

As part of our ongoing risk mitigation, we will:

- act promptly where a compliance breach has been identified or flagged; and
- continue to feedback lessons learnt into the compliance risk management process.

Our effectiveness in combating slavery and human trafficking

The above procedures are designed to reduce the risk of slavery and human trafficking occurring in our business and supply chains, and to enable us to monitor potential risk areas in our business and supply chains.

As outlined at the outset of this statement, our current assessment is that Mills & Reeve is at low risk of slavery and human trafficking occurring in our business and our supply chains. We will be looking to develop measurement criteria to assess our effectiveness in the future.

Further steps

In the next 12 months, we will look to:

- provide further training on slavery and human trafficking risks and the requirements of the Modern Slavery Act 2015 to partners and staff, as a refresher to previous training;
- enhance due diligence on our suppliers by reviewing our supplier questionnaire against CIPS ethical guidance, to ensure our suppliers have robust policies and procedures regarding the Modern Slavery Act 2015; and
- reward suppliers within the selection process that can demonstrate they behave in a manner that is consistent with our own [core values](#).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Mills & Reeve's slavery and human trafficking statement for the financial year ending 31 May 2019.