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# policy

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## Slavery and human trafficking statement 2017

Mills & Reeve LLP (“Mills & Reeve”) is committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. 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 over 115 partners and 870 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 its 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 its own business and its 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. All employees (excluding apprentices and interns) are paid at, or above, the living wage. 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 fifteen years in *The Sunday Times* 100 Best Companies To Work For. Indeed, we are the only law firm to have achieved this.

We carry out regular employee satisfaction surveys. Our last employee satisfaction survey (April 2017) 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. 83% of our employees said that they felt valued for the work that they do.

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

- Whistleblowing Policy;
- Harassment policy prohibiting harassment and intimidation; and
- Disciplinary policy prohibiting any threat of violence.

Training on slavery and human trafficking risks and the requirements of The Modern Slavery Act 2015 is available to partners and staff.

Our supply chain – Mills & Reeve’s purchasing policy provides that anyone responsible for purchasing services from suppliers 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, and with integrity and transparency, and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our supply chain. We have in place a supply chain compliance programme. This programme is designed to:

- identify and assess the potential risk areas in our supply chains; and
- check that all of Mills & Reeve's suppliers are aware of and comply with the Modern Slavery Act 2015 and are transparent, accountable, auditable and free from ethical ambiguities.

We operate a supplier policy and maintain a preferred supplier list. We also conduct due diligence on all suppliers before allowing them to become a preferred supplier (including due diligence relating to compliance with the Modern Slavery Act).

We expect all delivery partners, organisations within our frameworks and other companies we engage with to ensure their goods, materials and labour-related supply chains are free from any form of modern slavery. Our terms and conditions of purchase and framework supply agreements include appropriate contractual provisions to ensure that our suppliers are contractually committed to seeking to avoid the use of slave labour and trafficked labour.

As part of our ongoing risk mitigation, we will:

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

### **Mills & Reeve's effectiveness in combating slavery and human trafficking**

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 its business and its supply chains. We will be looking to develop measurement criteria to assess our effectiveness in the future.

### **Further steps**

We would like to enhance our due diligence on our suppliers by adding further relevant questions to the existing supplier due diligence questionnaire.

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 2017.

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Mills & Reeve LLP is a limited liability partnership authorised and regulated by the Solicitors Regulation Authority and registered in England and Wales with registered number OC326165. Its registered office is at 7th & 8th floors, 24 King William Street, London, EC4R 9AT, which is the London office of Mills & Reeve LLP. A list of members may be inspected at any of the LLP's offices. The term "partner" is used to refer to a member of Mills & Reeve LLP.

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