

## What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, human trafficking and committing an offence with intent to commit human trafficking (including aiding, abetting, counselling or procuring a human trafficking offence), 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.

### Vision and Values

- A **zero-tolerance** approach to modern slavery.
- **Ethical and integrity driven business practices** – aiming to establish effective systems to prevent modern slavery within our own business or any supply chains.
- **Transparency** – aligning with the obligations under the Modern Slavery Act 2015.
- **High standards** – we expect the same standards from all our contractors, suppliers and other business partners.
- **Procurement processes** – identify, assess and monitor risk within our supply chains and to protect whistleblowers.

### Responsibility

- **The Board of Directors:** overall responsibility for ensuring the policy complies with legal and ethical obligations, and that those under our control comply with it.
- **Legal Counsel and HR Director:** primary and day-to-day responsibility for implementing the 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 in any form, within our supply chains and our business.

### Communication and Awareness

- Annual training surrounding modern slavery is provided.
- Our zero-tolerance approach must be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced thereafter.

### Scope

The policy applies to:

- All members of Weightmans LLP;
- All persons working for or on behalf of Weightmans in any capacity; and
- Those who supply goods and services to us as part of our supply chains.

### Compliance

- Avoid any activity which may lead to, or suggest, a breach of the policy.
- Notify your **Team Manager** or a member of **HR** as soon as possible if you believe a conflict with the policy has or may occur.
- Raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains.
- Report any breaches (including possible future breaches) to your **Team Manager**, or in accordance with the **Whistle Blowing Policy**.
- 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 **Team Manager** or the **Head of Risk & Compliance**.
- Detrimental treatment due to such reporting, such as dismissal or threats, is strictly prohibited.

### Breaches

- Breach of the policy will lead to disciplinary action, which could result in dismissal for misconduct or gross misconduct in accordance with our Disciplinary Procedure.
- Relationships with other individuals and organisations working on our behalf may be terminated if they breach this policy.

### Interaction with other Policies

- Whistleblowing Policy
- Business Ethics Policy
- Supplier Management Standard Operating Procedure