

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out the actions that Leigh Day has taken to ensure that slavery and human trafficking does not occur within our firm or supply chain.

At Leigh Day we believe that everything we do is focused on the pursuit of social justice. At the core of the firm is a shared belief in a fair society where everyone has equal access to justice. That belief is reflected in our relationships with our staff, clients, suppliers, the local community where our offices are based and our impact in and on the wider community.

We take operating with integrity, social responsibility and high standards of ethical conduct incredibly seriously. We want to ensure all workplaces are environments where workers are safe from exploitation and harassment and where human rights are upheld to the highest standards.

It is within this framework that we take a robust approach in opposition to modern slavery and human trafficking and follow a zero tolerance approach wherever it is encountered.

This statement is published in line with section 54 of the Modern Slavery Act 2015 and relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

Organisational structure and supply chain

Leigh Day is a specialist claimant-led law firm primarily operating within the UK. We are a partnership with offices in London and Manchester and satellite offices in Liverpool, Chesterfield and Birmingham. We represent clients in six main areas of law and at present we employ approximately 440 people.

We are an office-based firm and have a number of regular suppliers that provide us with goods and services. We regularly seek the services of experts and consultants to work on client-related matters and source both permanent and temporary workers through recruitment agencies. Our work also involves some business-related travel both within the UK and overseas.

At present, we estimate that the overall risk of modern slavery and human trafficking occurring in our supply chains is low. However, we do not want to be complacent.

Our Management Board has overall responsibility for the firm's anti-slavery initiatives, including the publication of this **Modern Slavery and Human Trafficking Statement** as well as the implementation and review of the firm's **Anti-Slavery and Human Trafficking policy**.

Our policies and procedures

Our **Anti-Slavery and Human Trafficking Policy** is available on our staff intranet along with the firm's other key employment policies and procedures. This policy describes our approach to the identification, evaluation and ongoing management of the risks of modern slavery in our supply chain. It also outlines the ways in which both the firm and staff should act if they encounter slavery and human trafficking in our business operations or our daily lives.

The following policies and procedures reflect the firm's ethos and are relevant to the identification and prevention of modern slavery risks within our operations. The policies are accessible to all staff via our intranet.

- **Whistleblowing policy**

This policy encourages all staff to report suspected wrongdoing to the partnership in the knowledge that their concerns will be taken seriously, investigated appropriately and dealt with confidentially. The policy allows for concerns to be reported relating to the conduct of third parties such as suppliers or service providers, including issues regarding potential instances of slavery or human trafficking within our operations.

- **Equality, diversity and inclusion policy**

Our equality, diversity and inclusion policy aims to ensure that the firm provides a fair working environment where all current and prospective staff can thrive, and where difference is respected and valued. This policy applies equally to our suppliers and third parties in the expectation that their standards and ethical conduct will reflect our own.

- **Dignity at work policy**

This policy seeks to prevent harassment and bullying in the workplace but also within our business operations. It encourages staff awareness and outlines unacceptable conduct, including the disrespect, violation, exploitation and mistreatment of others.

- **Leigh Day Citizen Charter**

Our citizen charter makes clear to staff the actions and respectful behaviours expected of them by the firm. The charter outlines the ways in which staff must treat those around them in order to maintain the firm's values, ethos and high standards of conduct.

- **Supplier code of conduct**

We expect our suppliers to operate with social responsibility and high standards of ethical conduct and to provide a fair and safe workplace for their staff. In order to

ensure suppliers meet our expectations our **Supplier Code of Conduct** requires that they must not use slave, forced, bonded or compulsory labour and all terms of employment must be voluntary. We will require remedial action or seek to terminate our relationship with any supplier who persistently fails to comply with our **Supplier Code of Conduct**.

- **Procurement policy and procedure**

We are in the process of developing a **Procurement Policy and Procedure** which outlines the actions and decisions to be taken by the firm to ensure the sustainable and ethical procurement of its goods and services. All staff with responsibility for procurement within the firm will be expected to follow this policy and procedure.

- **Recruitment procedures**

Our internal recruitment team works with a carefully selected list of reputable recruitment agencies to source both permanent and temporary staff. We are signatories to the **Good Recruitment Charter** and require all agencies with whom we work to abide by this. Right to work checks and references are sought for all appointees. Our recruitment agencies are subject to the same scrutiny and risk assessment as our other suppliers of goods and services.

All of our policies are reviewed annually in line with Lexcel and internal compliance requirements.

Supplier due diligence

We continue to review our supplier database and identify information gaps relevant to our assessment of the risks of modern slavery within our supply chain. We have arranged our database in relation to those suppliers with greatest impact on our internal operations and carry out research to identify their position against two of the most significant risk factors for modern slavery; industry type and geographical location.

We have sent surveys to a selection of our top suppliers to better understand their procedures and the actions they have taken to date in relation to the risks of modern slavery and human trafficking. We will continue to collect this data to inform our supplier risk profile and help us to identify if remedial action needs to be taken in prevention of slavery and human trafficking occurring within their operations and supply chain.

Training

A **Talking Head** video, written and presented by one of our internal legal experts on modern slavery will be rolled out this year to equip all staff with the knowledge and awareness they need to identify and report potential modern slavery and human trafficking issues and risks. We will also design and deliver additional and in-depth training on the

operation of our procurement policy and procedures for those with responsibility for the procurement of goods and services for the firm.

Future steps

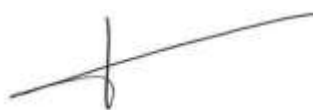
Although some progress has been made this financial year, we acknowledge that there is further work to be done to ensure that modern slavery and human trafficking is absent from our internal operations and supply chain. Over the next financial year, we aim to:

- Continue with the risk assessment of our suppliers to encompass all of the suppliers of our goods and services and further develop our risk assessment methodology and analysis
- Continue to work with our suppliers to ensure our supplier relationships remain in line with our values and high standards of ethical conduct
- Review and develop our *Procurement policy and procedures* to meet the overlapping needs of our internal committees (such as those responsible for diversity and corporate social responsibility). We will carry out a risk evaluation of new suppliers and ensure that an anti-slavery clause is included in supplier agreements going forward
- Update and distribute our *Supplier Code of Conduct* and initiate ad-hoc and periodic audits of supplier operations
- Roll out our *Talking Head* video to raise the level of awareness across the firm about modern slavery and human trafficking as well as designing and delivering in-depth training for our procurement staff
- Review our key performance indicators (KPIs) that help us to measure and monitor our progress towards ensuring there are no instances of modern slavery and human trafficking within our operations or supply chain

Management Board approval

This statement has been approved by the firm's Management Board.

Managing Partner's signature:

A handwritten signature in black ink, appearing to be 'Frances Swaine', written over a horizontal line.

Frances Swaine

Date: 4 October 2019