

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 policies, and the steps that Mills & Reeve has taken to deliver on our commitment, to safeguard against modern slavery in our organisation and through our suppliers.

Organisational Structure of Our Business

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 (SRA number 464604) to provide legal services. Mills & Reeve has 136 partners and 1012 employees and consultants nationwide and operates from offices in London, Cambridge, Norwich, Birmingham, Manchester and Leeds.

Our Employees

Within our business we have a low level of migrant labour. With the exception of apprentices (who are all paid over the minimum apprentice level) and interns, all staff are paid at or above the Living Wage Foundation rate. The standard terms and conditions of employment for all of our staff provide for the freedom of the employee to terminate their employment at any time, and state that any overtime is by agreement between Mills & Reeve and the employee.

Mills & Reeve is an inclusive employer, offering flexibility on work and home life balance. We have wellbeing support for all of our staff through our Diversity, Inclusion and Wellbeing programme, managed by a dedicated team of experienced Diversity, Inclusion & Wellbeing professionals. As a firm we address mental, physical, financial and digital wellbeing within our wellbeing programme. Support includes regular wellbeing catch ups, support from our Mental Health First Aiders (Wellbeing supporters) and an Employee Assistance Programme, and providing a range of webinars covering issues such as mental wellbeing, financial wellbeing, bereavement and domestic abuse.

We are very proud to have been listed for the last 18 years in The Sunday Times 100 Best Companies To Work For (mid-size organisations). We are still the only law firm to have achieved this.

We carry out regular employee satisfaction and pulse surveys. Our last employee satisfaction survey (in May 2021) found that our employees continue to have exceptionally high levels of employee engagement, with 97% of our employees responding they would recommend Mills & Reeve as a good place to work. 91% of our employees said Mills & Reeve genuinely cared about their wellbeing. 86% of our employees said they felt valued for the work that they do. Our next employee survey will take place around May 2023.

In 2020, Mills & Reeve signed up to the Mindful Business Charter and we are fully committed to ensuring that the wellbeing of our staff and partners remains a priority while still providing an excellent service to our clients.

We are also signatories to the Mental Health at Work Commitment, further enhancing our commitment to the wellbeing of our people. Our 2021-25 Diversity, Inclusion and Wellbeing strategy further demonstrates our commitment to continue enhancing our wellbeing practice.

Our Supply Chains

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.

Mills & Reeve's Procurement 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 our [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 great 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 our 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;
- continue to feedback lessons learnt into the compliance risk management process; and
- monitor, assess and respond to the risks caused by Covid-19 pandemic to our suppliers.

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 modern slavery and human trafficking in both the context of our own business and our supply chains.

Our Policies

In addition to our [Core Values](#), which guide how we work at Mills & Reeve, we also have the following policies published on our Intranet (which is accessible by all employees):

- Whistleblowing policy: protecting whistleblowers through our confidential reporting process;
- Harassment policy and guidance for employees prohibiting harassment and intimidation;
- Disciplinary policy: prohibiting any threat of violence; and
- Safeguarding policy: protecting from harm and promoting the wellbeing of young people and vulnerable adults; and
- Equality, Equity, Diversity and Inclusion policy: supporting our commitment to wellbeing in our practice.

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

programmes. This team will frequently write or contribute to articles on issues around modern slavery (particularly in the context of supply chains).

Our Due Diligence

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.

We will continue to monitor our 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.

We will reward suppliers within the selection process that can demonstrate they behave in a manner that is consistent with our [Core Values](#).

We will continue to monitor, assess and respond to the risks caused by Covid-19 to our employees, our business and our suppliers.

Our Training

In addition to Mills & Reeve's policies set out above, training on modern slavery issues is mandatory for our Procurement team and a requirement for all business support directors who approve purchase orders for goods and services to Mills & Reeve. Training is also available to those sections of the business directly involved in drafting supply chain type contracts, where modern slavery needs to be taken into account (for example, corporate, commercial, IP, IT, and construction).

As of 2021, all staff members have access to Modern Slavery training courses through our 'Learning Hub'. In June 2021 Mills & Reeve invited all employees to attend modern slavery awareness training delivered by the Slave Free Alliance. The purpose of this training was to raise awareness levels of the issues around modern slavery so as to ensure our employees have a greater understanding of the risks and indicator signs of modern slavery. We were delighted by the active engagement with this training by all of those who participated in it. Those unable to attend the training session could view the training video through the 'Learning Hub'. There is also an additional e-learning Modern Slavery course available to all our employees.

We have also promoted the Unseen App to all our employees so they are able to recognise and understand how they can report victims of modern slavery.

Declaration – Further steps

In the next 12 months, we will look to:

- review our supplier questionnaire to include inclusion, equity and wellbeing in the workplace;
- reward suppliers within the selection process that can demonstrate they behave in a manner that is consistent with our own values;
- re-emphasise and encourage use of the 'Unseen' App across Mills & Reeve;
- continue to monitor, assess and respond to the risks caused by Covid-19 to our staff and our suppliers;
- assess and recommend changes in service delivery and identify new risks for modern slavery.

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 2021. It has been approved and signed off by the board of Mills & Reeve on 24 November 2021.

Signature:

A handwritten signature in black ink, appearing to read 'Justin Ripman', followed by a horizontal line extending to the right.

Justin Ripman
Senior Partner
On behalf of the Board
Mills & Reeve LLP