

# 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 also the steps that Mills & Reeve has taken to deliver on our commitment during the global coronavirus (Covid-19) pandemic.**

## 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 133 partners and 961 employees and consultants nationwide and operates from offices in London, Cambridge, Norwich, Birmingham, Manchester and Leeds.

## Monitoring risks and adapting our activities and priorities in response to the Coronavirus (Covid-19) pandemic

### Adapting our working practices

During this extraordinary period the wellbeing of Mills & Reeve’s employees remains paramount and we continue to take a sensible and proportionate response to risk in line with current guidance. Our business continuity group has met regularly to assess the latest government advice, and updates from our senior management team have been issued to every employee: initially on a daily basis and still continuing on a twice weekly basis. The Mills & Reeve incident management team monitored the build up of the Coronavirus pandemic and potential of a nationwide lockdown ensuring, as a business, we had in place the technology and communication which would allow our employees to work remotely. In March 2020 we took the decision to re-deploy the majority of our staff to home working offering additional IT and workspace equipment. Only a small core team could return to the office to provide on-site support and full Covid-19 risk assessments were prepared, including social distancing measures, to ensure our employees or clients entering any of our offices were safe.

### Supporting our staff

Mills & Reeve has remained an inclusive employer throughout the Covid-19 period, encouraging our staff to support one another and offering flexibility on work and home life balance, wherever it was needed. We have also provided access to wellbeing support for all of our staff through our Diversity, Inclusion and Wellbeing programme. As a firm we address mental, physical, financial and digital wellbeing. We have enhanced our wellbeing further taking a holistic approach to provide support to our staff working at home and in offices. Support includes weekly wellbeing catch ups, support from our Mental Health First Aiders (Wellbeing supporters), providing a range of webinars covering issues such as mental wellbeing, financial wellbeing, bereavement and domestic abuse. We have risk assessed the health and safety of those within our teams that are at higher risk of Covid-19.

### **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. This has not changed during Covid-19.

### **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 (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.

We are very proud to have been listed for the last 17 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 around May 2021.

Earlier this year 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.

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

- Whistleblowing policy: protecting whistleblowers through our confidential reporting process;
- Harassment policy: 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.

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. Training of Mills & Reeve staff on modern slavery issues is provided on a team-by-team basis, with emphasis on those sections of the business involved in drafting supply chain type contracts where modern slavery needs to be taken into account (for example, corporate, commercial, IP, IT, and construction).

## **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 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 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;
- continue to feedback lessons learnt into the compliance risk management process; and
- monitor, assess and respond to the risks caused by Covid-19 to our suppliers.

### **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 look to:

- provide further training on slavery and human trafficking risks and the requirements of the Modern Slavery Act 2015 to various teams at Mills & Reeve;
- 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;
- reward suppliers within the selection process that can demonstrate they behave in a manner that is consistent with our own core values;
- roll out the 'Unseen' App across Mills & Reeve; and
- continue to monitor, assess and respond to the risks caused by Covid-19 to our staff and our suppliers.

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 2020.