

WINCKWORTH SHERWOOD LLP

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2019/20

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Winckworth Sherwood has taken and is continuing to take to ensure that modern slavery of human trafficking is not taking place within our business or our supply chain.

Winckworth Sherwood Policy statement

Modern slavery is a crime resulting in abhorrent abuse of the human rights of vulnerable workers. It can take various forms such as slavery, servitude or compulsory labour and human trafficking. The Firm has a zero tolerance approach to any form of modern slavery; it is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within its business of its supply chain.

Our business

Winckworth Sherwood LLP is a provider of legal services based in the United Kingdom employing over 330 partners and staff.

Responsibility for our policy

The partners of the firm have overall responsibility for ensuring that this policy complies with our legal and ethical obligations. It has been approved at senior management level and is subject to review annually.

The firm's managing partner has day to day responsibility for ensuring the implementation of the policy, monitoring its effectiveness and auditing the policies and procedures to ensure that they are effective in preventing the risk of modern slavery. Heads of department are responsible for ensuring that personnel in their departments understand and-comply with the policy.

Our Policy

Identifying potential victims of modern slavery can be a challenge. It can manifest in many different ways and the spectrum of abuse is not always clear. However, if individuals working for the firm believe or suspect that there is a breach or a conflict with this policy, either by the firm, by a contractor or by a supplier, they should report their concerns to their supervising partner or manager or the Managing Partner as soon as possible.

If unsure whether a particular act, treatment of workers or working conditions might constitute any of the forms of modern slavery, the government's Modern Slavery Helpline 0800 0121 700 should be contacted for guidance.

The firm operates a number of internal policies to ensure that business is conducted in an ethical and transparent manner. These include:

- **Recruitment policy** This includes conducting eligibility to work in the UK, checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

- **Whistleblowing policy** This is to ensure that all employees know that they can raise concerns about how colleagues are being treated, or practices of concern within our business or supply chain, without fear of reprisals.
- **Code of professional conduct** As a provider of legal services we are regulated by the Solicitors Regulation Authority and are therefore obliged to comply with its Code of Conduct for Solicitors

Winckworth Sherwood expects the same high standards from all its suppliers, contractors, and other business partners, and as part of its contracting process, it expects that its suppliers will in turn hold their own suppliers to the same standards. The firm accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited and this applies to all individuals working for the firm including agency workers, volunteers, agents, contractors, consultants and business partners.

The firm maintains a preferred supplier list. We conduct due diligence on all new suppliers before allowing them to become a preferred supplier and we would terminate the contract at any time should any instances of modern slavery come to light

Our performance indicators

We keep our policies and procedures under regular review and we will know the effectiveness of the steps that we are taking to ensure that slavery and that human trafficking is not taking place within our supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

A copy of this policy is published on the firm's Intranet site, which is available to all staff.



Roger Fitton, Managing Partner

16 April 2019