

## Shoosmiths LLP – Modern Slavery and Human Trafficking Statement 2024/25

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Shoosmiths LLP has taken during the financial year ending 31 March 2025 to prevent modern slavery and human trafficking in our business and supply chains.

### Introduction

Shoosmiths LLP recognises that all forms of human trafficking and slavery is a gross violation of human rights and as such we are committed to ensuring that slavery, servitude, forced or compulsory labour, and human trafficking do not take place in any part of our business or supply chains. We understand that transparency and accountability are essential in tackling these issues and we aim to ensure we communicate the actions we are taking with our stakeholders.

This statement refers to our financial year 2024/2025 with our year ending 31 March 2025.

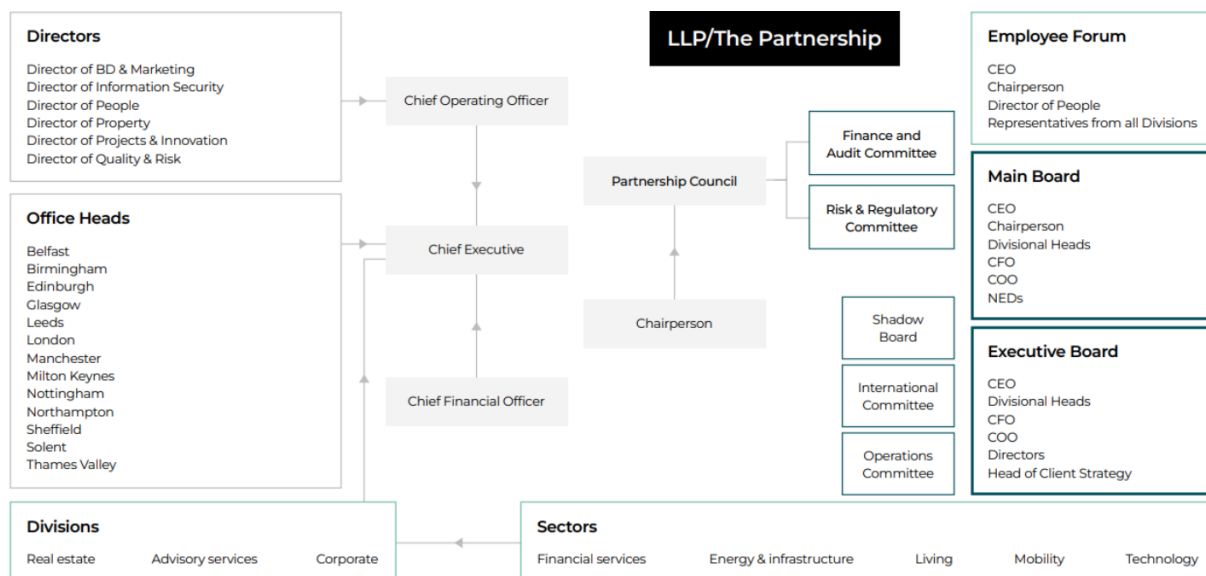
### Our Structure, Business and Supply Chains

Shoosmiths LLP is a law firm and is a limited liability partnership registered in England and Wales (registered number OC374987). The Shoosmiths group includes a number of subsidiaries and separately constituted legal entities which Shoosmiths LLP ultimately controls, and Shoosmiths (Northern Ireland) LLP (registered number NC001384) which is a separately constituted legal entity regulated by the Law Society of Northern Ireland.

Shoosmiths LLP also provides legal services in Scotland and ultimately controls Shoosmiths Europe LLP (registered number OC440739). We have been delivering legal services to businesses since 1845 and provide legal services via our advisory services, corporate, and real estate divisions.]

The Sustainability Steering Committee is responsible for oversight of the firm's sustainability strategy, including modern slavery prevention, and reports into the Main Board who are ultimately responsible for all elements of the firm's sustainability programme.

The structure of our partnership can be viewed below.



As a provider of legal services our supply chain is global and complex, consisting of circa 500 active suppliers in relation to the purchasing of goods and services that support the operations of our offices and services to our clients. These include office supplies, marketing materials, digital agents, IT

services and hardware, estate services including cleaning, waste management, refurbishments and maintenance, uniforms and catering, internal and external event services, security, couriers, and recruitment agents among others. We purchase professional services and work with other law firms and experts in the direct delivery of services to our clients including barristers and court services. Whilst we have visibility of our tier 1 suppliers, we have limited visibility of our supply chain below direct relationships we hold. The exception for this is our Facilities Management supply chain where we engage through our tier 1 supplier with our tier 2 suppliers, more details on this can be found in the due diligence section of this statement.

## **Policies and Governance**

We have a robust governance framework in place to address Sustainability across the firm, including modern slavery risks, through a dedicated steering group comprising senior leaders and a suite of policies, with internal supporting guidance.

- Human Rights Policy
- Community Investment Policy
- Health and Safety Policy
- Whistleblowing Policy
- Equal Opportunities Policy
- Bullying, Discrimination, Harassment and Victimisation Policy
- Procurement and Supplier Management Policy
- Supplier Code of Conduct

This year we strengthened our position on Human Rights with a new dedicated policy that incorporates best practice and lessons learnt over the previous 10 years of Modern Slavery Statement transparency.

Our employee policies and procedures set out our requirements on such issues as agile working, disciplinary, grievance, equal opportunities, flexible working and holidays, harassment and bullying, home working, hybrid working, mental health and wellbeing, pandemics, recruitment best practice, trans inclusion at work guidance, transitioning at work, our values, working practices, whistleblowing and your time. Our parental/family policies cover adoption leave, co-parent leave, fertility, maternity, parental bereavement leave, pregnancy loss, shared parental leave and time off for dependent care.

We expect all partners, employees and consultants to conduct themselves with honesty and integrity in all business and professional dealings on behalf of the firm, as such we published our new Ethics Guidance and “does the right thing” toolkit to empower colleagues to make informed, values-led decisions. The firm has a zero-tolerance approach to bribery, corruption and financial crime. This is supported by training which takes place during onboarding and annually together with robust with policies and procedures supervised by the centralised risk and ethics directorate.

Shoosmiths is an accredited Living Wage employer committed to ensuring fair wages and ethical practices. This accreditation reflects the firm’s dedication to social responsibility and the well-being of its employees and its third-party contractors.

Our whistleblowing policy sets out the process for reporting any concerns about wrongdoing or breaches of policies including forced or compulsory labour or human trafficking. If anyone has any concerns about raising a matter internally, they can alternatively use our external, independent whistleblowing service Safecall. Safecall can be contacted to register a concern about any matter by telephone or online 24 hour a day, seven days a week.

All of our policies, supporting guidance and procedures are available on our internal intranet and communicated to employees when updates are made. Policy compliance is managed through the owning area of the business, in coordination with our People Directorate and Risk & Ethics team.

We expect our suppliers to share our commitments and approach and by collaborative working we believe we can jointly have a positive impact on society. Our procurement and supplier management policy underpins our supplier selection process and details a range of environmental, social and ethical issues including slavery and human trafficking for consideration as part of the supplier selection process.

Our suppliers are asked to sign up to our supplier code of conduct covering laws and regulations, under age and forced labour, freedom of association, discrimination, wages and benefits, working hours, healthy and safe working conditions, environment, business integrity, discipline and grievances.

Externally Shoosmiths is a United Nations Global Compact (UNGC) participant and a member of the UK Network. We report annually on our progress against the 10 principles relating to human rights, labour, environment and anti-corruption. You can find Shoosmiths' details, including our reports to UNGC [here](#). Through our membership of the UNGC, we've engaged directly in working groups, including the United Nations Global Compact Network UK Modern Slavery Working Group. Members represent a number of industry sectors and share ideas, information and best practice.

### **Due diligence processes in relation to slavery and human trafficking in Shoosmiths' business**

Our people strategy is based on attracting, developing and retaining the best talent by reinforcing our values and providing a stimulating and rewarding work environment. We recognise everyone is unique and has special contributions to make in delivering the Shoosmiths strategy. Employee engagement is at the heart of our approach, and we want to inspire and empower our people to use their talents positively in our communities, whether that be locally, regionally, nationally, or ultimately at a global level.

Our recruitment and employment procedures include appropriate pre-employment screening of all staff to determine the right to work in the UK or Belgium where all our offices are based. Candidate sourcing is predominantly managed directly by the inhouse talent acquisition team. Over the last six years we have greatly reduced our use of recruitment agencies, but when they are required all recruitment suppliers are based in the UK or Belgium and agree to our terms and conditions and/or an addendum to those terms and conditions.

To the best of our knowledge there are no suppliers using a third party within the process and we deal directly with each supplier who is tasked with delivering the relevant service.

### **Due diligence processes in relation to slavery and human trafficking in Shoosmiths' supply chains**

A centre-led approach to procurement and supply chain management ensures that the organisation continues to conduct supply chain management in a consistent, fair and transparent way.

We continue to review our procurement processes, ensuring that we are focusing on continuous improvement in the engagement of our suppliers. As part of this review work, we are:

- continuing to invest in our procurement team, with the firm's first Sustainable Procurement Advisor joining the Shoosmiths on a full time, permanent basis to ensure Impacts, Risks and Opportunities (IROs) on ESG are managed effectively;
- Implementing a new Human Rights Policy that formalises our position and sets clear expectations across a number of topics;
- reviewing and updating our procurement policies and processes – including an enhanced responsible business evaluation to assess potential modern slavery risks, with standardised, and clearer roles and responsibilities involved in supplier selection and ongoing supplier management;
- improving our supplier onboarding process to provide a more robust supplier evaluation to mitigate any risks associated with modern slavery;
- continuing to embed our supplier code of conduct – ensuring we are engaging with suppliers who are committing to compliance with the Modern Slavery Act 2015;

- focusing on supplier contract management with standardised governance, templates, reporting and outputs;
- undertaking further categorisation of our supply chain – defining key suppliers, ensuring that we are assessing potential risks, including modern slavery risks with the right level of focus; and
- investing in centralised contract and procurement process technology solutions to allow us to more effectively identify, assess and manage our suppliers.

Our Property and Workplace team engaged with 75 tier 2 facility management outsourced suppliers, covering services such as office and window cleaning, cleaning consumables, couriers, landscaping, waste and recycling and all building services contracts. Each supplier received our survey letter and supplier code of conduct for completion and signature. We place particular attention on those involving unskilled labour and the direct supply of physical products. As part of our Slave Free Alliance audit in June 2023, all existing and new suppliers are required to sign a contract addendum to ensure compliance with modern slavery regulations and to confirm their understanding of the modern slavery reporting process and response action plan. No issues were reported by these suppliers.

For consumables goods, 23 suppliers informed us they are sourcing from the following countries: Australia, Belgium, Canada, China, Czech Republic, Denmark, France, Germany, Holland, India, Indonesia, Ireland, Italy, Japan, Malaysia, Netherlands, Poland, Singapore, South Africa, South Korea, Sweden, Turkey, UK and USA.

Tier 2 outsourced suppliers are vetted, and an annual compliance review is undertaken to include pre-employment screening, training, health, safety, and environmental and modern slavery compliance.

We currently have nine tier 2 suppliers who are accrediting living wage employers

### **Training and Awareness**

We believe that awareness is key to prevention. In 2024/25, we delivered training to our Main Board and Sustainability Steering Committee on sustainability governance, in collaboration with a social enterprise. This focus on capability building ensured our senior leaders can govern environmental and social risks effectively.

We continued to ensure new joiners undertook Modern Slavery training as part of their induction. All new starters in business services are assigned this required modern slavery e-learning training. The training covers four modules providing an introduction to modern slavery, what are the signs, action to take and an assessment of understanding.

We raise awareness amongst our staff about slavery and human trafficking which this year has included:

- information on our intranet which describes Shoosmiths approach and ways in which staff can help;
- the Unseen App is included as a feature on all new company iPhones and iPads. The App helps to make it easier to report concerns to the free confidential helpline 08000 121 700, operated by Unseen 24 hours a day 365 days a year. The helpline can be used by victims, members of the public and businesses to get help, report a suspicion or seek advice. The helpline website also provides resources and directories of services and helpline providers;
- in the run up to Anti-Slavery Day we engaged our colleagues, detailing Shoosmiths' approach and priorities and ways colleagues can get involved to raise awareness and support the work of organisations tackling the problem, including an awareness quiz to test colleague's knowledge and understanding of modern slavery and Shoosmiths' policies; and
- inclusion in our annual ESG reporting.

## Our advisory role

Modern Slavery Act advice and training is provided to clients by our regulatory team. This includes board briefings, compliance checklists, conducting investigations, preparing s.54 transparency statements, amending and drafting template contracts to include anti-slavery clauses, assisting with business deals clients are undertaking – including by considering if other parties involved are affected by the legislation and inserting anti-slavery clauses in agreements as necessary and advising clients on investigating allegations of modern slavery in their businesses and/ or supply chain and taking appropriate measures to improve standards and work with regulators, where applicable.

Our business immigration team (which forms part of our national employment team) also advises on right to work and sponsorship compliance and provides training on right to work checks and immigration compliance more widely. During the year our national employment team hosted a webinar on 'avoiding illegal working and managing risk' which included content about modern slavery risks and the consequences of non-compliance.

We offer our high-level compliance audit ESG 360, a high-level compliance audit tool to help organisations understand their ESG performance, free of charge. The tool includes a section on modern slavery.

## Parts of the business and supply chain where there is a risk of slavery and human trafficking taking place and steps taken to assess and manage that risk

As a professional services firm with office locations in the UK and Brussels it is considered that the level of risk of modern slavery or trafficking within the business is low. However, we continue to assess compliance and have not identified any parts of the business or supply chain where there is evidence of slavery and human trafficking taking place.

## Effectiveness in ensuring that slavery and human trafficking is not taking place in its business and supply chains and key performance indicator measures

Shoosmiths has not been informed of any incidents of slavery or trafficking during the year but will investigate any allegations should they arise and take appropriate action accordingly.

Divisions and directorates have not identified any internal business procedures that could make demands of suppliers or contractors that might lead them to violate human rights and we will continue to keep this under review.

## Key Performance Indicators

Key performance indicator	2022/2023	2023/2024	2024/25
Number of instances of modern slavery identified within Shoosmiths business operation or supply chain	0	0	0
Number of required staff who have completed e-learning training	65	55	61
% of required staff who have completed e-learning training	87	82	90
Number of suppliers who have signed up to the Shoosmiths supplier code of conduct*	25	102	98
Number of suppliers requested to complete a survey	146	128	114
Number of suppliers who completed a survey	105	108	99

**Priorities for 2025/2026**

1. Develop sustainable procurement strategy and procedures to ensure appropriate engagement with our supply chain in identifying and addressing the potential risk of modern slavery and human trafficking in our supply chain.
2. Continue to explore opportunities for collaboration with suppliers, peers and third sector organisations involved in mitigating and preventing slavery and trafficking within the UK.
3. Continue to raise awareness amongst stakeholders.

Further details about our approach to responsible business practices including our policy statements, our annual Impact and ESG reports, our blog SHOUTback and our United Nations Global Compact Communication on Progress disclosure.

**This approved statement is signed on behalf of the members by the Partnership Council on 30 September 2025 and is signed by:**

**David Jackson**

**Chief Executive**

**Shoosmiths LLP**