



Wiggin LLP

**Modern Slavery Act 2015: Modern
Slavery and Human Trafficking
Statement**

for the year ending 31 March 2021

15 June 2021



At Wiggin we strive to be **visionary, authentic, unified, responsible** and **excellent** in everything we do. Applying each of our values, we are committed to legal compliance and ethical business practices in all of our operations, and to continually evaluating and improving our practices to combat slavery and human trafficking in all its forms.

Our structure

Wiggin LLP has several group companies, including a branch office in Brussels, and other England and Wales registered entities. Wiggin LLP has its head office in England and Wales.

Our supply chain

As providers of legal services, our business and its supply chain has a limited risk of association with modern slavery and human trafficking.

We have implemented an anti-slavery and human trafficking policy and have provided mandatory training to all staff raising awareness of modern slavery and human trafficking and outlining how they can make a difference.

Our key suppliers are those required to support our professional service business, which is office based. The key areas of spend with suppliers are IT and Facilities Management (including catering and cleaning), with additional spend on recruitment, training & education and marketing. Spend on suppliers is concentrated in the UK.

Our aim is to foster long term relationships with our critical business suppliers, but we must improve our due diligence on any suppliers with whom we engage and recognise this is an area in which we can make improvements, which are detailed below.

Our policy on anti-slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery and human trafficking policy of 1 March 2021 reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

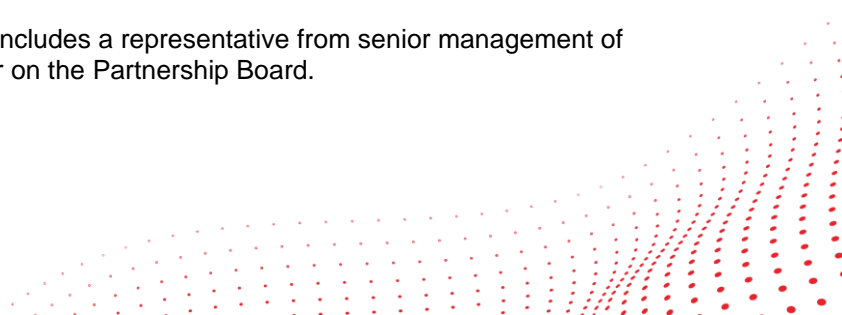
By the end of the financial year ending 31 March 2022 we aim to have systems in place to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

We are working on centralising our procurement procedures and reviewing existing agreements to ensure that all supplier contracts contain provisions ensuring adherence to our values and ethics.

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we are introducing a supply chain compliance programme. This program will be in place in the current financial year and will consist of a review of existing suppliers, and an enhanced due diligence procedure for new suppliers.

We have a dedicated compliance team, which includes a representative from senior management of the firm on the Operational Board and a partner on the Partnership Board.





Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide mandatory training to all our staff.

Accountability

We require all members, partners, employees, officers, directors and consultants of the firm, including temporary workers and others who are subject to the direction of the firm, to comply with our anti-slavery and human trafficking policy. As with all alleged violations of policy, we investigate issues and take the appropriate action up to and including termination of employment and termination of agreements for suppliers and contractors.

Further steps

We will:

- Review of the effectiveness of the steps we have taken no later than the end of May 2022.
- Continue to review our approach to modern slavery to evaluate its effectiveness and identify any gaps.
- Make further improvements to our supplier screening process and risk-based assessment of suppliers.
- Expand and embed knowledge of the issues and risks around modern slavery and human trafficking to all appropriate staff across the network of offices via regular communication and targeted training.
- Incorporate assessment of modern slavery awareness and compliance in our annual operational risk review process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2021. It was approved by the Partnership Board on 15 June 2021.

A handwritten signature in black ink, appearing to read "Alan Owens".

Alan Owens
Partner and Compliance Officer for Legal Practice
Wiggin LLP
15 June 2021

