

## ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made by Fragomen (GB) Limited and Fragomen LLP (collectively, "**Fragomen UK**", "**we**", "**us**", or "**our**"), in respect of our actions and activities during the financial year ending 31 December 2021, pursuant to section 54 of the Modern Slavery Act 2015 (the "**Act**"). This statement was approved by the board of directors of Fragomen (GB) Limited on 6 June 2022 and the members of Fragomen LLP on 10 June 2022. Our previous Anti-Modern Slavery and Human Trafficking statement can be viewed [here](#).

### OUR ORGANISATION

Fragomen UK is part of the worldwide Fragomen organisation ("**Fragomen**"), which is the world's leading exclusive provider of immigration services made up of law firms and consultancies with over 5,500 employees in more than 55 offices worldwide. In countries where Fragomen does not have offices or in-house practice groups, we work with carefully selected local advisors (called "Co-Counsel" or "Third Party Vendors") to deliver services to our clients in more than 170 countries.

For over 70 years, we have provided strategic immigration advice to a diverse range of clients from individuals to the world's leading multinational corporations. Fragomen's professionals are respected thought leaders in the immigration field providing expertise to governance bodies across the world including the US Congress, the UK Parliament, the European Union and the United Nations.

As an office-based global immigration services business, we also work with a wide range of facilities suppliers to support us in delivering services to our clients. These suppliers include, but are not limited to, real estate professionals, IT and technology professional services, business services such as cleaning, catering and security. Though some of our suppliers are local, others are engaged on a global scale.

Finally, as a global leader in immigration services, we are fortunate enough to find ourselves in an area of the legal services industry which is particularly attuned to the sensitivities of the human condition and the ills that threaten it. Given the nature of our business, we are uniquely positioned in aiding the fight against modern slavery directly by the very work that we do in that we assist people in securing legal status wherever they plan to work, study, or settle and thereby rendering them significantly less vulnerable to abuse.

### OUR POLICIES AND COMMITMENT

Fragomen UK has a zero-tolerance approach to modern slavery of any kind within our operations and supply chain. Our positive contribution to the work of our clients is matched by our commitment to running our own operations responsibly. We are committed to ensuring that modern slavery, human trafficking, child labour and any other abuse of human rights has no place in or around our organisation.

In order to deliver on our commitment, Fragomen UK has policies in place which set out the conduct we expect of our firm, all employees, partners, contractors and suppliers (including Co-Counsel and Third Party Vendors).

# FRAGOMEN

Our Anti-Modern Slavery and Human Trafficking Policy, which applies to all our people and stakeholders, reinforces the responsibilities and standards expected within our business or in any of our supply chains with regards to complying with the Act.

In addition, as part of our ongoing commitment to combating modern slavery, we regularly review our firmwide and UK policies, including, but not limited to, our Code of Conduct, Whistleblowing Policy, Procurement Policy, and our Employment and Recruitment Policies to ensure they comply with the Act.

Fragomen UK ensures that our policies are ingrained in both our operations and supply chain by taking significant steps to raise awareness of their requirements and engaging in detail with our staff and key suppliers. We communicate our expectations to employees and suppliers with regards to adherence to our policies in order to fulfil our principal objectives and responsibilities in relation to the Act.

At Fragomen UK, people are our most valuable resource at all levels of the business structure. In addition to ensuring that our employees and the employees of our contractors are paid fairly (and beyond the minimum wage), our employees are also entitled to additional benefits as part of our commitment to ensure that their health and welfare are fully supported both within and outside the workplace. Our UK benefits packages are competitive and geared towards supporting wellbeing as a priority. For example, in addition to health insurance cover, our employees have access to General Practitioners, physiotherapy and mental health support. We also offer added benefits aimed at employees with caring responsibilities; we have partnered with a leading global provider of employer-sponsored care, to support working parents and carers with discounted regular as well as emergency care solutions for children and adult/elder dependents.

## **DUE DILIGENCE PROCESSES, RISK ASSESSMENT AND MANAGEMENT**

As a professional services organisation, we consider the risk of modern slavery existing within our business to be low. However, to ensure that we are compliant with all applicable legislation and because of our commitment to the eradication of modern slavery and human trafficking, we have established a cross-functional working group, led by management of Fragomen UK, to identify, assess, monitor and mitigate potential risk areas in our supply chains and protect whistle-blowers.

Within our contractual agreements and compliance statements, it is our standard practice to require warranties and undertakings from our key suppliers and business partners to ensure that there is no forced or compulsory human labour, human trafficking or any other form of exploitation in any part of their businesses or supply chains. In 2021, we reviewed and updated our supplier terms to bolster these contractual obligations.

In addition, our supplier onboarding process now includes updated Anti-Modern Slavery questions and language alongside our standard due diligence checks to ensure our suppliers are committed to complying with local labour standards and assess the suitability of suppliers that provide services to us. We also ask our suppliers to sign our Compliance Certification on recertification which requires them to reconfirm their adherence to our Third Party Vendors Code of Conduct which includes confirmation that they comply with labour standards and Anti-Modern Slavery laws.

## **OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING**

For the year ending 31 December 2021, we had no reported incidents of any modern slavery or human trafficking in our supply chains.

Whilst we are proud of the steps that we have taken to date to combat modern slavery and human trafficking, we understand that modern slavery is ever-changing and that our approach must evolve to remain effective.

In 2021, our internal audit team carried out a global assessment of Fragomen's Anti-Modern Slavery programme to help us identify areas of improvement. We are currently in the process of reviewing the findings and recommendations and are committed to addressing them accordingly.

## **COVID-19**

We recognise that the COVID-19 pandemic continued to present disruption and challenges on working conditions in profound ways during 2021. We continued to implement COVID-19 measures to ensure our offices remained safe and accessible for all employees.

Further, to ensure that Fragomen UK is fully prepared should such an eventuality occur again or worsen, we continue to have a contingency plan in place which is assessed and reviewed on a regular basis.

Lastly, Fragomen UK made available a wide range of resources to assist our employees in dealing with the challenges brought about by the pandemic.

## **TRAINING**

Fragomen UK strives to maintain the highest standards of employee conduct and ethical behaviour. This is reinforced through the various internal policies which our employees are required to adhere to, most of which are relevant to combating modern slavery.

In addition, Fragomen UK is committed to ensuring that all our people understand what modern slavery is, the circumstances in which it may occur, are aware of modern slavery risk indicators and are equipped to identify instances of possible modern slavery and human trafficking. As part of this ongoing commitment, training on the Act's requirements and the escalation of concerns (without fear of retaliation) are mandatory for all employees in accordance with our Anti-Modern Slavery and Human Trafficking Policy.

In 2021, we reviewed, updated and rolled out our internal Anti-Modern Slavery and Human Trafficking Policy along with our Anti-Modern Slavery Training. The training has been implemented to ensure that the issue of modern slavery is always at the forefront of our employees' awareness, assist them in understanding how Modern Slavery might arise within the context of our business, inform them of the actions Fragomen UK has taken in order to reduce the risk of modern slavery taking place within the business, its supply chains and the wider Fragomen global organisation, and provide them with the tools to assist and support Fragomen UK in effecting its Anti-Modern Slavery programme. We have also committed to arranging refresher training sessions on a regular basis going forward to ensure that such knowledge is kept current, relevant and awareness is maintained.

In 2021, the training was completed by 79% of our employees and our goal is to achieve a completion rate of between 85-90% on the roll out of the next refresher training. We have now also included our Anti-Modern Slavery training as part of the induction package for all new joiners to ensure that they

are educated from the outset and that the proportion of our employee population trained progressively increases.

In 2021, we continued the successful implementation of our Responsible Business Strategy (“RBS”) which outlines our responsibilities and commitments to not only our employees but also the broader community. The intention of our RBS is to focus on five key “Pillars”:

- (1) Corporate Social Responsibility;
- (2) Diversity, Equity and Inclusion;
- (3) Wellbeing;
- (4) Social; and
- (5) Environment and Sustainability

all of which, in one form or another, contribute to Fragomen UK’s Anti-Modern Slavery programme.

Each Pillar has an employee representative “Lead” with a team of volunteer employees. The purpose of these Pillars is to raise awareness and promote the importance of each area; this is achieved via events, speaker engagements, and Policy initiatives with a view to ensuring that a culture of respect, inclusivity and consideration is embedded in all that we do. We have a RBS Board which is made up of the UK Partners and Corporate Leads. This Board provides guidance and approval for Pillar recommendations and also grants funding for specific initiatives.

In addition, in 2021, Fragomen UK had made material contributions in significantly updating the wider Fragomen network’s Code of Conduct and Code of Conduct training materials, which are expected to be rolled out in the near future, to ensure that anti-modern slavery practices are given due emphasis throughout the Fragomen network.

Beyond our regulatory duties, as an immigration law firm, Fragomen UK has an active interest in matters relating to the treatment (and sad mistreatment) of migrants and migrant populations, including trafficking.

While trafficking and asylum are not areas we specialise in, we want to help our employees understand the severe challenges that people can face through various events and communications and set that learning in the context of our own work on legal migration.

In 2021:

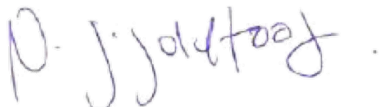
- as part of Fragomen UK’s Pro Bono Week, we arranged a series of talks focussing on refugee experience. Three events held centred on the organisations with whom we partner in the pro bono space and followed the lifecycle of a refugee’s experience;
- to observe World Refugee Day, we shared various communications highlighting the plight of refugees, the importance of recognising the challenges they face and taking action; and
- we have partnered with social mobility and refugee-support organisations to facilitate work experience programmes and create opportunities for impacted individuals at Fragomen UK.

## CITIZENSHIP

We have dedicated many hours to supporting civil society bodies committed to these causes and some of our partners hold advisory, trustee or non-executive positions in these institutions. Fragomen UK provides pro-bono legal and advocacy services to certain charities for migrants in need of quality legal advice.

We worked with a charity and the UK government to successfully launch the “Displaced Talent Mobility” pilot which aims to identify and address the administration and legal barriers that refugees face when moving internationally as skilled workers.

Signed



**Nadine Goldfoot**

DIRECTOR, for and on behalf of **FRAGOMEN (GB) LIMITED**

MANAGING PARTNER, for and on behalf of **FRAGOMEN LLP**

DATE 10.06.22