

## ANTI-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 2019, pursuant to section 54(1) of the Modern Slavery Act 2015 (the "**MSA**"). This statement was approved by the board of directors of Fragomen (GB) Limited and the members of Fragomen LLP on 19 June 2020. Our previous anti-slavery and human trafficking statement can be viewed [here](#).

### OUR ORGANISATION

Fragomen UK is part of the worldwide Fragomen network ("**Fragomen**"), which is a professional immigration services business made up of law firms and consultancies in more than 50 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.

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.

### 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. Therefore, we are committed to ensuring that 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 sets out the conduct we expect of our firm, all employees, our partners, contractors and suppliers.

Our anti-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 MSA.

In addition, as part of our ongoing commitment to combating modern slavery, we regularly review our firmwide policies, including, but not limited to, our code of conduct, whistle-blowing policy, procurement policy, and our employment and recruitment policies to ensure they comply with the MSA.

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 MSA.

As a global leader in immigration services, people are our most valuable asset at all levels of the business structure. In addition to ensuring that our employees are paid fairly (and beyond the minimum wage), our employees are also entitled to an array of additional benefits.

## **DUE DILLIGENCE 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 the management for 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 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.

During our last financial year ending 31 December 2019, we refined our supplier onboarding process to include 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 have also introduced an annual supplier recertification process where we require our suppliers to reconfirm their adherence to our Code of Conduct which includes confirmation that they comply with labour standards.

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

For the year ending 31 December 2019, 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 slavery and human trafficking, we understand that modern slavery is ever-changing and that our approach must evolve to remain effective.

For the subsequent financial year, we plan to carry out an audit of our supplier onboarding process, especially in relation to our biggest pool of suppliers, our Co-Counsel and Third Party Vendors, in order to monitor the efficacy of our processes to mitigate the risks of modern slavery, better ensure that slavery and human trafficking is not taking place in any part of our supply chains and to strengthen our suppliers' commitment in stamping out modern slavery in their own organisations.

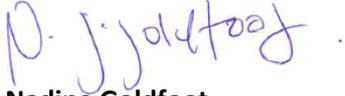
## **TRAINING**

Fragomen UK is committed to ensuring that all our people understand what modern slavery is and the circumstances in which it may occur, are aware of modern slavery risk indicators and are equipped to identify instances of possible slavery and human trafficking. As part of our commitment to raising awareness to the scourge of modern slavery and human trafficking, training on the MSA's requirements and the escalation of concerns are mandatory for all employees in accordance with our anti-slavery and human trafficking policy.

# FRAGOMEN

Over the next year, we plan to review our modern slavery training and policy, continue to reinforce these and raise awareness of the issues surrounding modern slavery to staff via regular office communications.

Signed



**Nadine Goldfoot**

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

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

**DATE** 19 June 2020