

# Anti Slavery

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Keoghs is authorised by the Solicitors Regulation Authority (SRA) to operate as an Alternative Business Structure (ABS) in 2012. Keoghs ABS SRA registration number is 573546 and is registered to the Parklands Head Office, Bolton.

Keoghs Topco Limited is the ultimate holding company, with all legal services are delivered to clients via Keoghs LLP, the trading entity.

## Our commitment

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Keoghs has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chain.

We are committed to ensuring that we are transparent regarding our business practices, to ensure that:

- We adopt best industry practice and are legally compliant in all our recruitment and employment processes, so that employees can be confident that modern slavery is not and will not take place internally;
- Employees and third parties can be confident that we adopt robust procedures for checking that modern slavery is not present anywhere in our supply chain;
- Employees know where to find help and guidance should they be concerned about modern slavery;
- Third parties know who to contact within the business should they be concerned about modern slavery in our supply chain; and
- Everyone can be confident that Keoghs will treat any report of apparent modern slavery seriously and that appropriate action will be taken.

Employees or contractors should report any activity that is or might lead to a breach of this policy, whether internal or external, to the QRC Team via section 6.5 the Incident Reporting Process. You should inform your line manager straight away if you are concerned that

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activity is taking place which would amount to a breach of this policy. Line Managers must contact [report@keoghs.co.uk](mailto:report@keoghs.co.uk) and report this issue immediately. The QRC Team will then engage with the relevant parties in order to investigate and take any appropriate action.

Employees/contractors can also raise any concerns using the reporting mechanisms set out in the Whistleblowing policy, which provides for the anonymous reporting of concerns. If an employee/ contractor is unsure about whether certain behaviour might constitute modern slavery, guidance is available from the QRC Team.

An employee or contractor who breaches this policy and engages in any activity which is tantamount to modern slavery or human trafficking will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Where appropriate, we may also report the activity to the relevant authorities.

If a supplier manager is approached by a supplier with a concern regarding modern slavery in our supply chain, they should contact [report@keoghs.co.uk](mailto:report@keoghs.co.uk) immediately. If the QRC Team become aware of any potential issue with a supplier as a result of a notification from a supplier or as a result of our due diligence and audit checks, this will be raised with the supplier manager and the Compliance Officer for Legal Practice, for a decision to be taken regarding our continued dealings with the supplier. Where appropriate, action will be taken, which may include notifying the relevant authorities and the removal of the supplier from our list of approved suppliers.

We encourage openness within our business, and Keoghs will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

### Our employees

- We adopt best industry practice and are legally compliant in all our recruitment and employment processes. Keoghs will:
- Ensure that all job vacancies are advertised appropriately internally and externally via official advertising routes;
- Undertake appropriate pre-employment checks including obtaining previous employment reference checks (up to 3 years), and where required DBS checks;
- Pay all of our employees the minimum wage or an above rate appropriate to their role;
- Set out our clear approach to modern slavery and human trafficking in this policy statement
- Adopt a framework of other HR policies and procedures that employees may find useful and relevant for managing any issues or incidents, such as the Whistleblowing and Grievance Policies;
- Offer an employee assistance confidential helpline which employees can contact with any work or personal related queries or concerns.

If an employee has any questions regarding our recruitment and employment processes or wishes to raise any issue or concern with the HR team, they should contact [HRSS@keoghs.co.uk](mailto:HRSS@keoghs.co.uk) or follow the steps outlined in the Whistleblowing Policy.

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## Our supply chain

We expect the same high standards and zero tolerance approach to modern slavery from all of our contractors, suppliers and other business partners. As part of our supplier due diligence processes, Keoghs will:

- Undertake appropriate checks to determine whether supplier policies and procedures are in place to deal with modern slavery and human trafficking in their own business and supply chain;
- Risk assess all suppliers to determine the level of risk the supplier's business may present to our business;
- Audit suppliers where appropriate, based on their risk rating, to conduct additional checks regarding their business operation; and
- Ensure that compliance with the Modern Slavery Act 2015 is a requirement of our standing terms of business.

If a supplier has any questions regarding our systems and controls in place in relation to supplier due diligence, audit and our terms of business, our supplier managers are asked to direct them to [report@keoghs.co.uk](mailto:report@keoghs.co.uk).

## Communication and training

Training on Financial Crime Prevention is mandatory for all new employees, and is rolled out across the business annually. Other training and/ or communications will be issued as necessary.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them, as part of our terms of business and will be reiterated as appropriate thereafter.

This statement is updated annually and sets out the steps we take to prevent slavery and human trafficking within our business and in our supply chain.

## Reporting suspected breaches

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

Employees or contractors are required to report any activity that is or might lead to a breach of our policy, whether internal or external, to the QRC Team via [report@keoghs.co.uk](mailto:report@keoghs.co.uk). The QRC Team will then engage with the relevant parties in order to investigate and take any appropriate action.

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**Keoghs Financial Year 01/07/2020 – 31/06/2021**  
**Approved by Keoghs Executive Board and Members**

The logo for Keoghs, featuring the word "Keoghs" in a stylized, cursive script font.