# Modern slavery statement

This statement is made on behalf of Capsticks Solicitors LLP pursuant to section 54 (1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement for the forthcoming year.

### Our approach

As a law firm, we recognise we have a responsibility to take a robust approach to slavery and human trafficking. Capsticks is absolutely committed to preventing acts of modern slavery and human trafficking from occurring within its business. We always work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. We expect high standards from those we work with and are committed to ensuring there is no modern slavery or human trafficking in our supply chains. We have an Anti-Slavery task group made up of our Operations Committee, with input from HR, who are responsible for ensuring our Anti-Slavery Policy is complied with and to manage any concerns or breaches.

## Our supply chains

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing 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 share our Anti-Slavery Policy with our main suppliers so that they are aware of our values and our expectations from those we work with. To date we have not been made aware of any human trafficking/slavery activities within the supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

#### **Policies**

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 Policy reflects this commitment to conducting our business with ethical principles. This includes ensuring effective systems and controls to avoid slavery and human trafficking taking place either within our firm or in our supply chains. Our policy is published on our intranet site alongside our Disclosure Procedure. If there are any genuine concerns about any wrongdoing or breaches of law these concerns can be raised in confidence without fear of disciplinary action. In addition Capsticks strive to maintain the highest standards of employee conduct and ethical behaviour in its general business and when managing its supply chain.

#### Performance indicators

In light of the introduction of the Modern Slavery Act 2015 the firm has committed to:

- Review its existing supply chains (to be completed by 30 November 2017);
- Develop a system for supply chain verification (also by 30 November 2017) which will enable the firm to evaluate potential suppliers before they enter the supply chain; and
- Ensure that our Anti-Slavery Policy is incorporated into our broader Corporate Social Responsibility initiatives.

## **Training**

We are in the process of raising awareness of modern slavery issues among all staff and partners and this will include:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking; and
- The policies we have put in place on Anti-Slavery, including how employees can alert the firm about potential slavery or human trafficking issues.

This statement has been approved by the firm's Partners. It will be reviewed (and updated if necessary) on an annual basis.