

Modern Slavery and Human Trafficking Statement

Foreword

Lyons Davidson Limited (LDL) is dedicated to promoting equal opportunities for all through our operations and services. We have developed a culture which promotes and stands against any form of discrimination or exploitation, including that of modern slavery and human trafficking. Our [core values](#) outline our commitment to acting responsibly, supporting our local communities, investing in our people and encouraging diversity and accessibility; meeting the varied needs of our clients.

As part of the legal sector, we recognise that we have a responsibility to take a robust approach to modern slavery and human trafficking. We are committed to preventing modern slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from modern slavery and human trafficking and comply with our values.

In light of upcoming legislative changes to the Modern Slavery Act, we have utilised our position as a law firm to raise awareness among our clients about their increasing reporting obligations. Most recently, this has been done through a blog post on our website which examines upcoming changes and how businesses can prepare for them.

As part of this on-going strategy, we will be working in collaboration with STOP THE TRAFFIK, a leading NGO focused on working with businesses and vulnerable communities to prevent modern slavery. We are looking forward to working together over the coming year to undertake a comprehensive training programme that will raise awareness of modern slavery risks across our organisation. We will also be risk mapping our Tier 1 supply chain and enhancing our existing due diligence around our customer processes in order to further mitigate our risk of modern slavery. We are looking to strengthen our own reporting processes whilst also sharing modern slavery best practice throughout our networks.

STOP THE TRAFFIK: "We are excited about working together with Lyons Davidson to develop their modern slavery risk mitigation strategy. Lyons Davidson's position within the sector provides a unique position to promote best practice

for modern slavery prevention and we are looking forward to working collaboratively in this vital area.”

Lyons Davidson fully supports the UK’s Modern Slavery Act 2015 (the Act) and the provisions set out. This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out Lyons Davidson Limited’s (LDL) actions to assess potential modern slavery risks related to its business and to put in place steps aimed at ensuring that there is no modern slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2019/2020 and has been approved by the Board of LDL.

1. Our Organisational Structure and Supply Chains

This policy covers the activities of Lyons Davidson Limited/Lyons Davidson Scotland LLP and File Dynamics Limited.

LDL is a law firm providing legal services to businesses and individuals nationwide. File Dynamics Limited provides support functions to the business.



Figure 1: LDL’s 2021 office locations

LDL operates from four locations in England and Wales together with its associated practice in Edinburgh.

We employ around 650 team members in Lyons Davidson Limited and File Dynamics Limited.

Our supply chain comprises of suppliers as expected in the running of a legal services office including: experts instructed to provide advice to our clients; counsel; facilities services; recruitment agencies; training providers and equipment providers.

The Company only operates in the UK.

Responsibility for LDL's anti-modern slavery initiatives is as follows:

- Overall: LDL Board
- Policies: HR department
- Risk assessment and due diligence: Compliance Director
- Training: Training department

2. Policies in Relation to Human Trafficking

The following policies are relevant to LDL's approach to the identification of modern slavery risks and the steps to be taken to prevent modern slavery and human trafficking in LDL's operations:

- **Whistleblowing Policy** This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. LDL's whistleblowing procedure aims to make it easy for staff to make disclosures confidentially, without fear of retaliation. Employees, clients or others who have concerns can raise these with us at any time.
 - LDL encourages all of its staff, clients and other business partners to report any concerns related to the direct activities, or to the supply chain of, LDL.
- **Code of Conduct**
 - LDL's code makes clear to employees the actions and behaviour expected of them when representing LDL. LDL strives to maintain the highest standards of employee conduct and ethical behaviour.
- **Corporate Social Responsibility Programme**
- This documents LDL's approach to its responsibilities in relation to social, ethical and environmental issues. It deals with the way in which LDL aims to limit any adverse impact caused by LDL's business in these areas, and to promote a responsible approach in the way it conducts business, which

includes preventing modern slavery and human trafficking in its operations.

- **Equal Opportunities**

LDL is committed to promoting equal opportunities in employment, with this policy setting out LDL's approach to equal opportunities and the avoidance of discrimination at work. Employees and any job applicants receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation ('Protected Characteristics'). This policy also outlines what an individual can do if they feel they have suffered discrimination or been treated unfairly, including through the Company's confidential Grievance Procedure or through its Anti-bullying and harassment policy.

3. Risk Assessment

Annually our company undertakes a risk assessment to determine the level of modern slavery and human trafficking risk to our business, for our employees, clients and within our supply chain.

Although we acknowledge that our risk of modern slavery is relatively low considering we operate in the professional services sector, we acknowledge that no business is without risk. Additionally, we recognise the associated risk that operating as a national law firm brings with it.

Thus, although we recognise that there is a low risk for our employees, operating in professional service roles which have a low risk for modern slavery, our recruitment policies and processes include appropriate checks on all new employees and regular meetings to ensure that all our staff are safe and supported.

In the coming year we will be beginning work to integrate an ethical focus into our customer due diligence. This will allow us to explore the risk that our clients may be facing and develop resources to support them as best as possible.

Our supply chain is likely to be where the highest risk of modern slavery lies for our company. We have assessed that our high-risk suppliers are likely to provide facilities services, manufactured products, and construction and refurbishment.

In order to assess the risk inherent in our supply chain and produce an appropriate action plan to manage that risk, we will be conducting a supply chain risk mapping with STOP THE TRAFFIK over 2021-22. This risk mapping of

our Tier 1 suppliers will develop a strategic overview of the inherent modern slavery risk in our supply chain by ranking suppliers by their modern slavery risk in both their sector and country of operation. This will create a list of suppliers who will be prioritised in modern slavery due diligence processes over the course of the next year of work.

Any risks identified from the above processes will be prioritised and dealt with in accordance with comments set out below.

4. Due Diligence

As outlined above, we recognise that our highest risk is within our supply chains. Our supply chain risk mapping will identify suppliers which need to be prioritised in our modern slavery due diligence practices. It is anticipated that the highest risk suppliers, warranting enhanced due diligence, are likely to provide facilities services, manufactured products, and construction and refurbishment.

In general, LDL undertakes due diligence when considering taking on all new suppliers, and when reviewing existing suppliers. These mitigating steps include:

- Evaluating the modern slavery and human trafficking risks of each new supplier by assessing the sector and geographical associated risks;
- Considering whether they are required to produce a Modern Slavery and Human Trafficking Statement, and reviewing any such statement and associated policies as part of contract negotiations/tender processes with any new supplier;
- Addressing any high-risk areas identified with the suppliers;
- Entering into a remediation process with suppliers who fail to address non-compliances;
- Taking steps to improve any suppliers' practices which cause concern, including requiring them to implement action plans;
- Where a potential frequent supplier is unwilling to co-operate with our enquiries, considering if that is a business relationship we wish to start.

During 2021-22, in addition to our internal activities, we are planning to work with STOP THE TRAFFIK to distribute awareness raising resources amongst our networks promoting best practice for modern slavery prevention. The activities will include:

- raising awareness among our clients about the changes to the Modern Slavery Act and their increasing reporting obligations as outlined in our blog [LINK].
- circulating awareness resources specifically aimed at small and medium sized enterprises (SMEs) who we work with, to provide tailored guidance for modern slavery prevention and to reduce the risk of modern slavery occurring on their sites

Our aim is to strengthen resilience to modern slavery across our networks and to ensure that businesses are not exploiting people within their operations or supply chains without their knowledge.

5. Training

In the past year, due to the impact that the COVID-19 pandemic has had on our business and operations, our training on modern slavery and human trafficking has been delayed. However, our aim for the next year is to conduct a programme of training with STOP THE TRAFFIK in order to better understand and respond to identified modern slavery and human trafficking risks. This will include:

- An overview of the various forms of modern slavery and trafficking and the current picture of modern slavery both in the UK and globally;
- An overview of the Modern Slavery Act 2015 and the upcoming changes to the Act;
- How Lyons Davidson's supply chain is at risk of modern slavery, primarily in facilities services, manufactured products, and construction and refurbishment; and
- How to report concerns and respond to incidents effectively

As well as directly training staff, LDL will raise awareness of modern slavery issues to all staff via our intranet, with information explaining:

- The basic principles of the Modern Slavery Act 2015;
- The changes to the Modern Slavery Act 2015;
- How employees can identify and prevent modern slavery and human trafficking;
- Where employees can report potential modern slavery or human trafficking concerns within the Company; and
- Signposting for relevant external reporting organisations and additional resources.

6. Key Performance Indicators

We understand the importance of measuring our performance against our commitment to preventing modern slavery and human trafficking. In order to assess the effectiveness of our approach to modern slavery, LDL will be reviewing on an annual basis the following key performance indicators:

- % of staff who have received modern slavery training
- % of supply chain inherent risk mapped
- # of awareness resources developed and shared with our networks

7. Our Next Steps

Throughout the coming year, in order to meet our commitment to prevent modern slavery and maintain human rights in our operations and supply chain, we are committing to following these next steps:

- Supply Chain Risk Mapping
- Awareness training for staff
- Begin circulating modern slavery best practice resources for our clients
- Improving our supplier and customer due diligence processes

8. Statement Approval

This statement covers the financial period May 2020-May 2021 and has been approved by the Company's Board of Directors on 27 May2021, who will review and update it annually.

Signed by

Alex Hewitt

Compliance Director

Date

27/05/2021