

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 2020, 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 on 11 May 2021 and the members of Fragomen LLP on 18 May 2021. 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 the world's leading exclusive provider of immigration services made up of law firms and consultancies with over 4,500 employees 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.

For over 60 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 governments 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 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, our partners, contractors and suppliers (including Co-Counsel and Third Party Vendors).

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 and UK 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.

At Fragomen UK, 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 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; we have recently partnered with the world's leading 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 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. In 2020, we have reviewed and begun updating our supplier terms to bolster these contractual obligations.

In addition, our supplier onboarding process includes 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.

We understand that we could do more in this regard and therefore in 2020, we have begun discussions with our internal audit team to carry out an assessment of our supplier procurement process in 2021 to identify areas where we could do better and hopefully establish a formalised programme in assessing current and prospective suppliers. To complement this, we have also carried out a mapping exercise of our current suppliers to lay the groundwork for the implementation of future supplier programmes.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

For the year ending 31 December 2020, 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. We therefore plan to bring modern slavery to the forefront of the priorities of Fragomen's management with a view to further improving Fragomen's global anti-modern slavery programme.

COVID-19

We appreciate that the COVID-19 pandemic brought with it unique challenges for most businesses in 2020, including the heightened risk of modern slavery occurring within companies and their supply chains. Fragomen UK was no exception. In response, Fragomen UK actively took steps to address these concerns.

From the beginning of the pandemic, our London-based EMEA HR Director was responsible for ensuring the full safety and wellbeing of our 400+ UK-based employees. In collaboration with the UK Managing Partner and a team of Corporate Leaders including the Senior Office Manager, we followed all UK government requirements as well as our global Fragomen guidelines established with a view to further enhancing safety and wellbeing.

This involved managing the closure of our UK offices during lockdown. All employees were successfully deployed to work from home supported by a number of very important initiatives and guidelines to protect their health and wellbeing. This included reminders of all the UK benefits support available such as the Employee Assistance Programme and our trained Mental Health First Aiders. We introduced regular wellbeing sessions during the year focusing on mindfulness and positive mental health. We also provided funding to employees to purchase office equipment to assist them to work from home. Our UK Managing Partner hosted weekly, moving to bi-weekly virtual employee town halls via WebEx to ensure continued connectivity with all staff; during these sessions, HR often reminded employees of the host of support available.

Both UK offices are subject to rigorous COVID safety requirements including mandatory mask wearing, social distancing and an onsite cleaner at all times. Our offices are regularly fully sanitised, sufficient PPE was provided as a health care package sent to employees' homes and health measures were put in place to help stop the spread of the virus including risk assessments and COVID training. Additionally, Fragomen UK implemented social distancing rules and devised a plan to minimise the number of employees and visitors in the office at any given time whilst at the same time ensuring that the business remained viable. We also worked with our landlords to ensure that our office spaces and facilities were fitted appropriately to cater to the new demands brought about by the pandemic.

None of our employees were compelled to return to the office; however we continued to offer employee support remotely and, during the periods allowed by the UK government, the option for staff to attend the office for their mental wellbeing.

Additionally, our suppliers were contacted to be reminded of their obligations to adhere to our modern slavery policy. We also worked closely with many of our suppliers to extend the contracts we placed on hold at the height of the pandemic and ensured all invoices had been paid.

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 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 this commitment, training on the MSA's requirements and the escalation of concerns (without fear of retaliation) are mandatory for all employees in accordance with our anti-slavery and human trafficking policy.

In 2020, we launched 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 ensure a focus on five key "Pillars" which are (1) Corporate Social Responsibility (2) Diversity, Equity and Inclusion (3) Wellbeing (4) Social and (5) Environment and Sustainability. 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 – made up of the UK Partners plus Corporate Leads. This Board provides guidance and approval for Pillar recommendations and also grants funding for specific initiatives.

In 2020, we have also begun reviewing and updating our modern slavery training and policy with a view to rolling these out in 2021.

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 and set that learning in the context of our own work on legal migration. In 2020, we have arranged for expert speakers to talk to our employees on a range of issues:

- an MP's researcher talked to staff about how legal migration, irregular migration and asylum are discussed and addressed in Parliament;
- a journalist from a major UK publication talked about how journalists approach migration and issues relating to migration;
- the Chief Executive of a labour exploitation charity talked about the risks migrant communities face, with reference to Brexit and Covid-19; and

- during Refugee Week 2020 we heard about how refugees move from refugee camps (and elsewhere) to the UK and Australia and the systems that are intended to support them.

CITIZENSHIP

We have also dedicated many hours to supporting civil society bodies dedicated to these causes. Indeed, some of our partners hold advisory or non-executive positions in these institutions. Fragomen UK also provides pro-bono legal and advocacy advice to certain charities working with the UK government to create a new visa category to ease the entry of refugees into skilled UK employment.

Signed



Nadine Goldfoot

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

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

DATE 20 May 2021