

SLAUGHTER AND MAY /

MODERN SLAVERY - SLAVERY AND HUMAN TRAFFICKING STATEMENT

30 OCTOBER 2022

Slaughter and May is a leading international law firm, providing a full and extensive range of legal services to a diverse range of clients.

We seek excellence in every aspect of our business and are committed to the highest standards of professionalism, ethics and integrity. We are committed to conducting our business in a lawful manner and this includes engaging with our suppliers to support them in working against modern slavery.

As required by the Modern Slavery Act 2015 (the "Act"), this statement describes the steps which Slaughter and May has taken during the financial year ended 30 April 2022 and beyond to ensure that slavery and human trafficking is not taking place in any of our supply chains, or in any part of our own business. Slaughter and May Services Company, the in-house company that we use to engage our staff, has a separate [statement](#).

Business model

In London we practise through a general partnership which also has offices in Brussels and Beijing. In Hong Kong we practise through a separate partnership. For further information about our business model, including how we are regulated, see the [Legal and Regulatory Information](#) on our website.

Supply chain relationships

Our key suppliers are the businesses which help us to run our premises, such as our catering, cleaning and security providers, or who supply us with the technology we need to deliver our legal services to our clients as well as recruitment agencies who provide us with both legal and business services staff who are key to our operations. We tend to foster long-term relationships with these first-tier suppliers with regular renewals of contracts to ensure we actively reassess their services and to help us work with suppliers to strengthen their approach. We also avoid making demands of our suppliers that might lead to them violating human rights. For example, we require our catering, cleaning and security suppliers to pay their personnel, who work at our premises, a salary which is equivalent (at least) to the London Living Wage. The London Living Wage reflects the high cost of living in the capital and is higher than employers are required to pay by law.

Supplier Code of Business Conduct

We expect our suppliers to have fair employment practices, as articulated in our [Supplier Code of Business Conduct](#). This encourages our suppliers to conduct their businesses ethically and we ask key suppliers to sign it to make their commitment to fair employment practices clear. A supplier's compliance with our Supplier Code of Business Conduct is an important factor in us deciding whether to form, continue or renew a relationship with them. Any breach of our Code by a supplier, including not having fair employment practices which prohibit modern slavery, may result in us terminating our arrangements with the supplier. Our standard supplier contracts also include specific obligations on modern slavery.

As well as our own offices, we have close working relationships with other leading law firms across the world. However, we have no exclusive alliance with other law firms and are therefore independent and able to work alongside the lawyers selected by our clients in any jurisdiction. Ordinarily our clients engage their lawyers directly but, occasionally, we may do so on their behalf. If this is done on a sub-contracted basis, we generally rely on our knowledge of the other law firm and their business and the fact that they are regulated and/or committed to high ethical standards and would not usually send them a copy of our Supplier Code of Business Conduct.

Supplier training

We previously held a “Supplier Symposium” at our offices, with a programme which included training for our key suppliers on the requirements of the Act as well as our own ethical expectations in this area. Following the success of this event a further hybrid event will be held in early-2023.

Internal training

We provide training to our employees who have responsibilities in relation to engaging the firm’s suppliers. This covers not only the offences in the Act, but how to go about evaluating suppliers and mitigating risks within supply chains. Our aim is to raise awareness of the issues and increase informed scrutiny.

In July 2022, the firm provided firmwide training on modern slavery and human trafficking through our ‘Environmental, Social and Governance Impact Series’ (“ESG Impact Series”).

The ESG Impact Series addressed modern slavery and human trafficking in a session on “ESG due diligence trends and supply chains from a decarbonisation and sustainability perspective”. This training provided an overview of human rights and accountability in supply chains in the context of relevant international frameworks such as the OECD Guidelines and the UN Guiding Principles on Business and Human Rights. It also covered obligations for businesses to identify, prevent and mitigate adverse environmental and human rights impacts of their activities as well as proposed changes to the current Modern Slavery regime.

The firm intends to run a further internal Modern Slavery event dedicated to promoting awareness of modern slavery and human trafficking. The aim is to provide our employees with a greater understanding of supply chain risks, including modern slavery and human trafficking, as they relate to the firm and our clients.

Risks

We try to identify risks to workers in our supply chain by regularly refreshing the due diligence we carry out on our key suppliers before we engage them and through the ongoing supplier management processes we have in place.

When selecting our suppliers, price is not our only driver. We are committed to buying quality products and services from ethical suppliers and part of measuring this involves assessing the approach a potential supplier takes to its people and the workers in its own supply chain. At the start of 2022 we published the latest version of our internal “Supplier Relationship Management Guide”, which stresses this point, with the next version of this due by the end of 2022.

Covid-19 has heightened the risks of modern slavery in a range of sectors. In recognition of that, we revisited our modern slavery risk mapping across our supply chain to assess where modern slavery was most likely to arise. This assessment considered a range of factors including the jurisdiction of the supplier, their own supply chain, and the business sector. All those suppliers identified as higher risk will be individually approached for discussion and, in some cases where deemed appropriate, an additional audit on this area will be carried out. The purpose of this is to work with our suppliers and influence their approach positively.

Performance indicators

We meet formally with each of our key suppliers at least annually and, among other things, address their approach to slavery and human trafficking at those review meetings. We use contract management software to interrogate our contractual terms (including those dealing with the Act) with suppliers more easily.

In addition, managers responsible for the firm’s relationship with key suppliers visit them at their own premises from time to time, and at times on short notice. This gives us an opportunity to observe first-hand their working conditions and to talk to a sample of their workers direct. In many cases, we have a contractual right to audit the performance and working practices of our suppliers.

Further to our most recent supplier risk mapping exercise, we have developed our Contract Management System by creating a Supplier Relationship Management feature which specifically asks questions that can form part of a Supplier Review process. This includes assessing and scoring our significant suppliers' approach to modern slavery. This feature will allow us to rate their respective performance and seek continual improvement from them. The contract owners will be tasked with obtaining the applicable score from the Director of Responsible Business and we will be working on this engagement plan in the forthcoming year.

Our own business initiatives

Code of Business Conduct

Our commitment to fair employment practices in relation to our own employees is embodied in our [Code of Business Conduct](#). This provides information about how we approach our day-to-day activities and the principles in it are covered in inductions for new staff and reinforced through training. The standards in the Code are reflected in our policies and procedures and we endeavour to embed them in everything we do.

UN Global Compact

We became signatories to the United Nations Global Compact in 2019. This commitment includes our support of the Ten Principles of the Compact, which covers human rights, labour, environment and anti-corruption. It also includes promotion of the Sustainable Development Goals, of which Target 8.7 (under SDG8 - Decent work and economic growth) explicitly addresses forced labour, modern slavery and human trafficking.

We publish an annual [Communication on Progress](#) (or our 'Responsible Business report') as a signatory to the United Nations Global Compact. The report covers the firm's work with suppliers, its engagement with clients, its culture and how it supports employees, as well as its carbon reduction ambitions, its pro bono work and support of the community. The firm's supplier engagement, ethics and culture of integrity are central to ensuring that slavery and human trafficking is not taking place in the firm's supply chains.

Employee engagement

We promote key responsible business activities throughout the year and aim to engage everyone in the firm with our responsible business commitments and our progress to integrate responsible business into our operations and supply chain. In 2021, we launched six priority Sustainable Development Goals for the firm, which includes a focus on modern slavery under Goal 8, decent work and economic growth, and ran a variety of events and campaigns that were aligned to these.

Over the next 12 months we are taking action to drive positive working practices in our supply chain, including on modern slavery, diversity and environmental performance.

Deborah Finkler, Managing Partner

London

T +44 (0)20 7600 1200

F +44 (0)20 7090 5000

Brussels

T +32 (0)2 737 94 00

F +32 (0)2 737 94 01

Hong Kong

T +852 2521 0551

F +852 2845 2125

Beijing

T +86 10 5965 0600

F +86 10 5965 0650

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For further information, please speak to your usual Slaughter and May contact.

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