

# MODERN SLAVERY - SLAVERY AND HUMAN TRAFFICKING STATEMENT

30 OCTOBER 2024

## 1. Introduction

- 1.1 As required by the Modern Slavery Act 2015 (the “Act”), this statement describes the steps which Slaughter and May has taken during the last financial year (1 May 2023 to 30 April 2024) to ensure that modern slavery and human trafficking is not taking place in any of our supply chains, or in any part of our own business. In this statement references to “modern slavery and human trafficking” are as defined in sections 1, 2 and 3 of the Act.
- 1.2 We are committed to maintaining the highest standards in every aspect of our business. This includes our supply chain, where we consider the risk of modern slavery or human trafficking to be greatest. We work collaboratively with our suppliers to encourage them to take appropriate steps to prevent modern slavery and human trafficking.

## 2. Business, organisational structure and supply chains

- 2.1 Slaughter and May is a leading international law firm, providing a full and extensive range of legal services.
- 2.2 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.
- 2.3 Slaughter and May Services Company (“SMSC”) is the in-house company that we use to engage our staff in London and Brussels and arrange the secondment of individuals to/from the firm. As of 25 April 2024, SMSC employed 1,422 legal and business services staff. SMSC has a separate [statement](#) and is wholly-owned by the partners of Slaughter and May.
- 2.4 Our supply chain is predominantly focused on running our premises and supporting the delivery of legal services. Our key suppliers include our catering, cleaning and security providers, the businesses that supply us with the technology we need to deliver our legal services to our clients and the recruitment agencies who provide us with both legal and business services staff (our “Key Suppliers”).
- 2.5 We also frequently work in partnership with other law firms to advise our clients on multi-jurisdictional matters. This approach is fundamental to our business model. Ordinarily our clients engage these other law firms directly, but from time to time we do so on their behalf on a sub-contracted basis.

## 3. Policies

- 3.1 We are signatories to the United Nations Global Compact. This commitment includes our support of the Ten Principles of the Compact, which covers human rights, labour, environment and anti-corruption. We publish an annual [Responsible Business Report](#) which outlines the progress we have made against our six priority Sustainable Development Goals for the firm (see in particular “Taking a proactive approach to modern slavery” and “Embedding sustainable practices in our supply chain”). Our Responsible Business Report is reviewed and updated on an annual basis by our Responsible Business department, in coordination with other business services staff.

- 3.2 Our [Supplier Code of Business Conduct](#) requires that our suppliers have fair employment practices which comply with the law and that they do not engage in any practices that are known to contribute to the risk of modern slavery and human trafficking. This Code requires that suppliers ensure their sub-contractors comply with the standards described in this Code. The vast majority of our suppliers have agreed to comply with this Code and we generally embed obligations to comply with this Code in our supplier contracts. Alternatively we seek assurances from suppliers that their own Code of Conduct contains equivalent standards. This forms part of our supplier selection criteria. We are in the process of updating our Supplier Code of Business Conduct and intend to publish this within the next reporting period.
- 3.3 Our commitment to fair employment practices in relation to our own employees is embodied in our [Code of Business Conduct](#). Our Code is underpinned by [our values](#) - the highest standards, independence of thought, collective endeavour and respect for all. The principles in it are covered in inductions for new staff, reinforced through regular training for existing staff and reflected in our policies and procedures. We are in the process of updating our Code of Business Conduct and intend to publish this within the next reporting period.
- 3.4 We have a detailed Procurement Guide for Business Services which sets out the processes operational managers who procure goods and/or services for Business Services departments (“Contract Owners”) on behalf of the firm should follow. We also have a Supplier Relationship Management Guide to assist Contract Owners in managing supplier relationships. Each of these guides are available to our partners and staff on the firm’s intranet and reviewed at least annually by our Procurement department. These guides address the importance of assessing the ESG performance of our potential and existing suppliers, including in respect of modern slavery and human trafficking, on an ongoing basis.
- 3.5 We have an internal Supplier due diligence policy which sets out the checks Contract Owners should run for new and existing suppliers of the firm, details of which are set out below. This guide is available to our partners and staff on the firm’s intranet and reviewed on an annual basis by our Procurement department.
- 3.6 Our internal Whistleblowing (raising concerns) policy requires staff to raise any concerns relating to possible criminal offences, breaches of the law, a serious breach of firm policy or procedure and any aspect of the firm’s operations or premises which may endanger someone’s health or safety, or any other concern. If staff wish to raise concerns, they may do so in confidence (unless the firm is required to comply with a competing legal or regulatory obligation). The firm will not tolerate victimisation of anyone who raises a concern of suspected wrongdoing. This policy is reviewed on an annual basis by our HR department.

#### **4. Risk assessment and due diligence processes for suppliers**

- 4.1 The firm is a regulated legal service provider operating within a strict ethical and regulatory framework. Accordingly, we consider the risk of modern slavery or human trafficking occurring within the firm’s business to be low. We recognise that there is a greater risk of modern slavery or human trafficking occurring within the firm’s supply chain. For this reason, this statement focuses on our due diligence processes in relation to our supply chain. We have a separate statement for SMSC, the in-house company we use to engage our staff and arrange the secondment of individuals to/from the firm, which describes our recruitment due diligence processes.
- 4.2 We generally regard our labour-intensive on-site business services suppliers as being at higher risk of modern slavery and human trafficking, which include our Key Suppliers.
- 4.3 In 2023 we conducted a modern slavery risk mapping exercise across our Key Suppliers 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. As a result of this assessment, Contract Owners were advised to approach suppliers identified as higher risk, investigate how they were managing the risk of modern slavery and human trafficking in their operations and supply chain and obtain suitable assurances.
- 4.4 We undertook a review of our central Procurement function following which we created a new role of Head of Procurement. During the next reporting period the Head of Procurement will be responsible for leading a programme of development including greater alignment of procurement policies across the firm’s offices.

- 4.5 Our internal Supplier due diligence policy requires Contract Owners to consider the potential risks associated with engaging new suppliers at the outset of each procurement project, and for existing suppliers when a contract is due for renewal, if the controller of the supplier changes or on a regular basis for longer-term contracts. This includes identifying whether there is an increased risk of modern slavery or human trafficking, for example due to the nature of the goods or services being procured or the jurisdiction involved. Contract Owners cooperate with the firm's Procurement department as necessary in carrying out their risk analysis and in determining whether further due diligence is needed.
- 4.6 Contract Owners are required to conduct adverse media checks at the outset of all procurement projects. The firm's Procurement department also conducts regular adverse media checks for our catering, cleaning, security and engineering providers, as well as our on-site design agency.
- 4.7 Our Key Suppliers, and other suppliers identified as being higher risk by the approach described above, must complete a Responsible Business Supplier Due Diligence Questionnaire to demonstrate they meet the necessary standards we expect in respect of human rights and fair working practices. This includes, but is not limited to, asking whether the supplier publishes an annual modern slavery statement, adopts practices known to contribute to the risk of modern slavery and human trafficking (for example, holding identification documents belonging to workers or preventing workers from leaving the workplace during non-working hours) and provides training or education to staff on modern slavery and human trafficking.
- 4.8 We encourage Contract Owners to include a contractual audit right to monitor the performance and working practices of a supplier where the due diligence conducted during the selection process has identified a potential risk area, including in relation to modern slavery.
- 4.9 We are an accredited Living Wage Employer by the Living Wage Foundation and we require our on-site catering, cleaning, engineering and security suppliers in the London office to pay their personnel 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 UK employers are required to pay by law.
- 4.10 We are in the process of developing a due diligence questionnaire for other law firms we work with. This will require these firms to confirm whether they have policies and procedures in place to prevent modern slavery and human trafficking in their own operations and supply chain. It will also require that other law firms confirm they agree to comply with our Supplier Code of Business Conduct. We aim to launch this questionnaire with law firms we work with frequently in the next reporting period.
- 4.11 If our due diligence causes us to suspect that modern slavery or human trafficking may have occurred in our supply chain, we would investigate this. If instances of modern slavery or human trafficking were confirmed, we would engage in remediation discussions or terminate our arrangements with that supplier.

## **5. Additional risk management practices**

- 5.1 Contract Owners are required to meet formally with Key Suppliers at least annually and, among other things, address their approach to modern slavery and human trafficking at those review meetings. Where there are areas for improvement in a supplier's approach to modern slavery and human trafficking, based on their responses to the Responsible Business Questionnaire (see above), Contract Owners are encouraged to monitor their progress and work with them to strengthen their approach.
- 5.2 The "SDG Working Group" is responsible for setting measurable targets in line with our commitment to support the Sustainable Development Goals to embed further sustainable practices in the business. This Working Group comprises two partners and individuals from across Business Services. Its purpose is to regularly discuss progress against the firm's SDG targets, including in respect of the firm's controls to prevent modern slavery and human trafficking from occurring within our supply chain.

## **6. Supplier engagement**

- 6.1 We recognise that combatting modern slavery requires us to work collaboratively with our suppliers. We are committed to working with our suppliers to enhance our knowledge of their practices so that we can actively work with them towards building ethical and sustainable supply chains. We do this by encouraging open dialogue with our suppliers, sharing best

practices, and educating ourselves on this issue. We had planned to conduct a further “Supplier Symposium” engagement session in 2024, discussing with our Key Suppliers the requirements of the Act and our ethical expectations in this area. However this session has been delayed until 2026 following completion of the refurbishment of our London office. Meanwhile, Contract Owners continue to engage with Key Suppliers as part of their annual review meetings.

## 7. Effectiveness and performance indicators

- 7.1 No instances of modern slavery or human trafficking were identified within our business or supply chain during the last financial year.
- 7.2 Our contract management system includes a supplier relationship management feature which enables us to assess and score our suppliers’ approach to modern slavery and human trafficking (high, medium and low risk). This feature allows us to rate their respective performance and seek continual improvement from them.

## 8. Training

- 8.1 In November 2023 we launched our “Supplier Contracts Training Mini-Series” designed to provide a reminder to employees in Business Services who regularly review, or are responsible for managing, supplier contracts of key points to consider when reviewing supplier contracts. As part of this series, in April 2024 we conducted a session discussing key modern slavery and human trafficking risk factors (including country and sector risks, workforce dynamics and management controls), contractual obligations and ongoing relationship management.
- 8.2 In February 2024, as part of the firm’s “ESG Impact Series”, we delivered the firmwide training session “Human Rights: the shift in gear – changing how our clients do business”. This session focused on the move of human rights from the realms of voluntary guidelines to mandatory legal requirements, and the impact of this on how the firm advises its clients, including in respect of modern slavery and human trafficking risks. 116 members of staff attended this training session.

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