

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

October 2019

This statement is made on behalf of Addleshaw Goddard LLP pursuant to section 54(1) of the Modern Slavery Act 2015 (**MSA**).

Addleshaw Goddard is an international legal practice carried on by Addleshaw Goddard LLP and its affiliated undertakings. Details of the jurisdictions in which we offer legal services are available on our [website](#).

This statement relates to actions and activities during the financial year 1 May 2018 to 30 April 2019.

Our commitment:

- ▶ We are committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as contemplated by the MSA (**Modern Slavery**) in any part of our business or in our supply chain.
- ▶ In our policies, due diligence, contractual arrangements, training and reporting regimes, we are implementing and enforcing effective systems and controls to ensure that Modern Slavery is not taking place in any part of our business or in our supply chain. Our General Counsel & Risk team works in conjunction with our Central Procurement and Human Resources teams to help ensure our compliance with the MSA.
- ▶ We welcome the transparency encouraged by the MSA and this statement sets out for the public, and for our clients, suppliers and employees, the steps that Addleshaw Goddard is taking in this regard.

Our policies:

- ▶ Our commitment to [Business with Integrity](#), which is publicly available on our website, clearly sets out our commitment to acting ethically in all our business relationships and the standards of integrity, ethical supply and social and environmental responsibility which we expect of our suppliers.
- ▶ Our [Procurement Policy and Supplier Code of Conduct](#), which is publicly available on our website, sets out in detail our expectations with regard to supplier commercial practices. The Supplier Policy requires compliance with legislation, codes of conduct, professional regulation and best practice appropriate to the supplier's business. The policy includes obligations on suppliers to enable Addleshaw Goddard to comply with its obligations under the MSA and to help Addleshaw Goddard achieve its own commitments with regard to Modern Slavery.
- ▶ Our employees are also assisted by our **Whistleblowing Policy** which provides a framework for all employees to be confident in the knowledge that, if they consider it appropriate to raise a concern about another employee's behaviour or practices, which they reasonably believe to be illegal, dangerous or unethical, they can report this without fear of retribution, victimisation or detriment.

Supplier due diligence:

- ▶ We include specific questions on practices which may suggest Modern Slavery in our due diligence process for suppliers.
- ▶ When shortlisting suppliers, we review supplier responses to the questions posed and make any concerns known to them.
- ▶ We update our due diligence on high risk suppliers annually and, for our medium risk suppliers, we will renew our due diligence as part of the contract renewal process.

- ▶ We constantly strive to improve our due diligence process and the assessment of the data received from our suppliers. In the past year, due diligence regarding Modern Slavery has been reviewed and updated for all suppliers. Particular attention has been given to our non-UK offices, where we have identified a higher risk of Modern Slavery in the supply chain than for the UK-based offices. Raising awareness of Modern Slavery has been achieved by including Modern Slavery on the agenda for non-UK office visits, undertaken by our Head of Premises, Client and Office Services, and by introducing a new questionnaire dealing specifically with identifying risks of Modern Slavery for the non-UK office locations.

Supplier obligations:

- ▶ We look to incorporate our Procurement Policy and Supplier Code of Conduct into our contracts and all other engagements with third party suppliers, creating a contractual obligation to comply with its provisions.
- ▶ We look to incorporate reporting obligations and rights of audit into our contracts to ensure that we can monitor the supplier's compliance with key elements of the contract.
- ▶ Through our ongoing supplier engagement activities we continue to emphasise the importance of transparency and compliance with the MSA and our willingness to work with suppliers on any issues identified. We encourage suppliers to approach us and engage in a constructive dialogue as a means of resolving any issues.

Staff training:

- ▶ To ensure a high level of understanding of the risks of Modern Slavery in our supply chains and our business, dedicated training has been provided by General Counsel & Risk to the Central Procurement and HR teams.
- ▶ Annual refresher training is also provided for existing team members and is included as part of induction training for new team members.

Review and reporting:

- ▶ An annual meeting between General Counsel & Risk, Central Procurement and HR takes place during which current policies and procedures are reviewed, identified risks are discussed and mitigating action points are agreed relating to the eradication of Modern Slavery within our business and supply chain.
- ▶ Where instances or any potential risks of Modern Slavery are identified within our supply chain, this information is escalated to the Head of Procurement and the Chief Operating Officer to determine the appropriate action(s) to be taken.

Signed



Charles Penney
Senior Partner

addleshawgoddard.com

Aberdeen, Doha, Dubai, Edinburgh, Glasgow, Hamburg, Hong Kong,
Leeds, London, Manchester, Muscat, Singapore and Tokyo*

*a formal alliance with Hashidate Law Office

© 2019 Addleshaw Goddard LLP. All rights reserved. Extracts may be copied with prior permission and provided their source is acknowledged. This document is for general information only. It is not legal advice and should not be acted or relied on as being so, accordingly Addleshaw Goddard disclaims any responsibility. It does not create a solicitor-client relationship between Addleshaw Goddard and any other person. Legal advice should be taken before applying any information in this document to any facts and circumstances. Addleshaw Goddard is an international legal practice carried on by Addleshaw Goddard LLP (a limited liability partnership registered in England & Wales and authorised and regulated by the Solicitors Regulation Authority and the Law Society of Scotland) and its affiliated undertakings. Addleshaw Goddard operates in the Dubai International Financial Centre through Addleshaw Goddard (Middle East) LLP (registered with and regulated by the DFSA), in the Qatar Financial Centre through Addleshaw Goddard (GCC) LLP (licensed by the QFCA), in Oman through Addleshaw Goddard (Middle East) LLP in association with Nasser Al Habsi & Saif Al Mamari Law Firm (licensed by the Oman Ministry of Justice), in Hamburg through Addleshaw Goddard (Germany) LLP (a limited liability partnership registered in England & Wales) and in Hong Kong through Addleshaw Goddard (Hong Kong) LLP, a Hong Kong limited liability partnership pursuant to the Legal Practitioners Ordinance and regulated by the Law Society of Hong Kong. In Tokyo, legal services are offered through Addleshaw Goddard's formal alliance with Hashidate Law Office. A list of members/principals for each firm will be provided upon request. The term partner refers to any individual who is a member of any Addleshaw Goddard entity or association or an employee or consultant with equivalent standing and qualifications. If you prefer not to receive promotional material from us, please email us at unsubscribe@addleshawgoddard.com. For further information, including about how we process your personal data, please consult our website www.addleshawgoddard.com or www.aglaw.com.