

# Group Modern Slavery Statement

Financial Year ending 30 April 2017

This statement comprises the modern slavery statement of Simmons & Simmons LLP (“[Simmons & Simmons](#)”) in compliance with the Modern Slavery Act 2015. It sets out the steps that Simmons & Simmons has taken during the financial year ending 30 April 2017 to ensure that modern slavery is not taking place in our business or our supply chain.

At Simmons & Simmons, we seek to provide legal services according to the highest ethical and professional standards and we take our responsibilities to our clients, our people, our suppliers and the communities in which we do business seriously.

We have won a number of awards, which recognise the hard work we have put into ensuring fair and non-discriminatory treatment of firm employees (e.g. Top 30 Employer for Working Families, Top 50 Employer for Women by The Times and a Stonewall Top Global Employer) and also to ensuring fair access to all sections of society (e.g. our award-winning Young Talent Programme).

We are proud of our culture of corporate responsibility (CR), of which an important component is the commitment to preventing modern slavery in all its forms.

## The firm’s business and risk profile

Simmons & Simmons is an international law firm, working in locations across Europe, Asia and the Middle East. We focus on four key sectors: asset management & investment, financial institutions, life sciences and technology, media & telecommunications (TMT). We also have significant expertise in the energy and infrastructure market.

We have more than 900 legal staff world-wide, and we operate in the following countries:

- England and Wales
- France
- The Netherlands
- Spain
- Germany
- Ireland
- Italy
- Belgium
- Luxembourg
- Qatar
- UAE
- Singapore
- Hong Kong
- China

As a supplier of legal services, we operate in a sector which is at relatively low risk of modern slavery occurring. Furthermore, the majority of the countries in which we operate are ranked as low risk by the Global Slavery Index, and we do not have an extensive supply-chain.

## Measures to combat modern slavery

Despite this low risk, we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our trained and experienced HR department oversees recruitment of office staff and ensures that appropriate checks are carried out before taking a new member of staff on.

Once at Simmons & Simmons, our staff are protected by our comprehensive range of policies which reflect our commitment to acting ethically and with integrity at all times. Relevant policies, which are firmly entrenched in the way we do business, include:

- Human Rights Policy
- Diversity and Inclusion Policy
- Ethics Policy
- Bullying and Harassment Policy
- Grievance Procedure
- Anonymous whistleblowing hotline
- A Health and Safety Policy Statement, and procedures

We have robust client due diligence processes in place. Our client inception team review both new and existing clients by monitoring relationships for areas of risk or concern and by conducting media screenings for any adverse reports. Our policy is to escalate any cases which give us cause for concern from a human rights or modern slavery perspective to senior management for consideration.

Simmons & Simmons only deals with reputable and well-established suppliers of goods and services and carries out risk-based due diligence on its suppliers.

### Overview of 2016/2017

During 2016/17, our key area of focus was on improving our processes to identify and address any risks arising in relation to our supply chain. In particular:

- We have instigated annual reviews of our top 25 suppliers. As part of that review, we ask suppliers to answer a supplier questionnaire, which includes questions relating to their approach to modern slavery and what measures they adopt to combat it. This enables us to assess whether any additional steps are required.
- We incorporated modern slavery as a topic within our CR Supplier Relationship Roundtable Framework, which involves annual meetings with our major global suppliers and a discussion of best practice.
- We are developing a Supplier Code of Conduct and a firm-wide preferred supplier agreement to ensure consistency of approach throughout our offices in relation to a number of issues, including modern slavery. We are in the process of ensuring that all of our suppliers sign up to one or both of these.

### Objectives

We remain committed to minimising the risk of modern slavery and human trafficking in our business, supply chains and client base and to ensuring that we have appropriate processes in place to do this. In particular, we are continuing the exercise of ensuring that our new and existing suppliers sign up to our code of conduct and/or preferred supplier agreement across our international office-base.



Colin Passmore  
Senior Partner

[elexica.com](http://elexica.com) is the award winning online legal resource of Simmons & Simmons

© Simmons & Simmons LLP 2018. All rights reserved, and all moral rights are asserted and reserved.

This document is for general guidance only. It does not contain definitive advice. SIMMONS & SIMMONS and S&S are registered trade marks of Simmons & Simmons LLP.

Simmons & Simmons is an international legal practice carried on by Simmons & Simmons LLP and its affiliated practices. Accordingly, references to Simmons & Simmons mean Simmons & Simmons LLP and the other partnerships and other entities or practices authorised to use the name "Simmons & Simmons" or one or more of those practices as the context requires. The word "partner" refers to a member of Simmons & Simmons LLP or an employee or consultant with equivalent standing and qualifications or to an individual with equivalent status in one of Simmons & Simmons LLP's affiliated practices. For further information on the international entities and practices, refer to [simmons-simmons.com/legalresp](http://simmons-simmons.com/legalresp)

Simmons & Simmons LLP is a limited liability partnership registered in England & Wales with number OC352713 and with its registered office at CityPoint, One Ropemaker Street, London EC2Y 9SS. It is authorised and regulated by the Solicitors Regulation Authority.

A list of members and other partners together with their professional qualifications is available for inspection at the above address.