

# Group Modern Slavery Statement



## Financial year ending 30 April 2018

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 taken by Simmons & Simmons during the financial year ending 30 April 2018 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 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 our employees (e.g. Times Top 50 Employer for Women, Top 30 Employer for Working Families, Stonewall Top Global Employer), and fair access to all sections of society (e.g. International CSR Excellence Award for our Young Talent programme).

As a firm, we are proud of our culture of corporate responsibility, 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 funds, 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.

We have a trained and experienced HR department that oversees the recruitment of office staff and ensures that appropriate checks are carried out before taking on new members of staff.

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
- 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. As is our policy, cases which give us cause for concern from a human rights or modern slavery perspective are escalated to the firm's senior management for consideration.

We have reviewed and assessed the main areas of modern slavery risks posed by our supply chain with a view to taking appropriate and risk-based actions to mitigate those risks. As a firm, we only deal with reputable and well-established suppliers.

### Overview of 2017/2018

Our key focus for 2017/18 was on implementing our risk-based processes to prevent the risks of modern slavery arising in relation to our supply chain. In particular:

Following our review of our top 25 suppliers in 2016/2017, we continued to work with them to support their development and improvement across a range of CR areas, including the measures they have adopted to combat modern slavery.

We continue to include modern slavery as a topic within our annual CR Supplier Relationship Roundtable event, at which we discuss best practice on a range of key CR issues.

We developed a set of model contractual clauses, which include a clause requiring our suppliers to commit to compliance with modern slavery legislation. These clauses have now been distributed to those parts of the firm who deal with our suppliers to ensure their incorporation into the supplier agreements we enter into.

### 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. This year, we aim to refresh our assessment of the modern slavery risks facing our business and to establish whether there are any as yet unidentified areas of risk that we should be taking further steps to mitigate.



**Colin Passmore**  
Senior Partner

For additional information on our firm, please visit our website at [simmons-simmons.com](http://simmons-simmons.com).

© Simmons & Simmons LLP and its licensors. All rights asserted and reserved. This document is for general guidance only. It does not contain definitive advice.

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, United Kingdom. It is authorised and regulated by the Solicitors Regulation Authority and its SRA ID number is 533587. The word "partner" refers to a member of Simmons & Simmons LLP or one of its affiliates, or an employee or consultant with equivalent standing and qualifications. A list of members and other partners together with their professional qualifications is available for inspection at the above address.