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Modern Slavery and Human Trafficking Statement

This statement is published on behalf of Hogan Lovells International LLP, Hogan Lovells (Paris) LLP and Hogan Lovells Services pursuant to section 54 of the UK Modern Slavery Act 2015. It constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2018.

Introduction from Chair and Chief Executive Officer

Every day we have to advise our clients on their responsibilities, their rights, their ethical and professional obligations, and the consequences of getting them wrong. We take the same approach with our own business and try to hold ourselves to the highest standards.

As one of the world's leading law firms, operating from 52 offices across six continents, we have a responsibility to uphold and champion the rule of law and its underlying principles. We support the UK Government's objective of eradicating modern slavery and human trafficking in all its forms, and are committed to ensure that human rights abuses, however they may arise, are recognised and eradicated in our business and supply chains.



Leopold von Gerlach
Chair, Hogan Lovells



Stephen J. Immelt
CEO, Hogan Lovells

For the purposes of this statement, the term 'modern slavery' encapsulates slavery, servitude, forced or compulsory labour, and human trafficking (that is to say, the practice of illegally transporting someone from one area or country to another, usually for the purposes of being exploited).

Our business, organisational structure and supply chains

Hogan Lovells International LLP, Hogan Lovells (Paris) LLP and Hogan Lovells Services are part of Hogan Lovells, an international legal practice that works with corporations, financial institutions, governments, and social enterprises across the spectrum of their business and legal issues both globally and locally. We have in excess of 6,000 people working from 52 offices in Africa, Asia, Europe, Latin America, the Middle East, and the United States. For further information about our organisation, please see the ['About Us'](#) section at www.hoganlovells.com.

Our business is office-based and our primary supply chain categories support those office operations. Supply categories include office space, office services (including the provision of security, catering office supplies and cleaning), IT and technology, professional services, and business travel. There are more than 1,000 first tier (i.e. direct) suppliers in our supply

chain.

Policies and commitments

Hogan Lovells is committed to the highest standards of ethical, moral and legal business conduct and we expect our suppliers to uphold the same values. We have adopted a modern slavery policy which prohibits modern slavery in our business and supply chains, and are committed to implementing systems and controls aimed at ensuring that modern slavery is recognised and eradicated.

We have a human rights policy which confirms that we respect and support international human rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.

Hogan Lovells is a signatory to the UN Global Compact and we produce an annual Communication on Progress setting out how its principles are integrated across our organisation, including principles one ('the protection of internationally proclaimed human rights') and four ('the elimination of all forms of forced and compulsory labour').

In addition to being member of the UN Global Compact, Hogan Lovells have endorsed the UN Guiding Principles on Business and Human Rights. We respect human rights and implement that through our management policies and processes and by providing education and training for our people. We also support the UN Sustainable Development Goals.

Initiatives in London

We sit on the Advisory Panel to the UK's Anti-Slavery Commissioner and perform voluntary legal work in support of their aims. We also have a partnership with London's Metropolitan Police and various other charities to support victims of forced prostitution and labour, and have recovered substantial compensation for victims.

We are voluntary signatories to London Living Wage (LLW). This campaign provides a benchmark for employers who choose to pay their employees at a rate which is calculated according to the cost of living. We pay our employees at a rate higher than the LLW, but we also require our contract staff providers, such as caterers, to pay their own employees the LLW rate as a minimum.

Modern slavery risks and steps to eliminate

We have a dedicated core group addressing risks in the area of modern slavery and ensuring that appropriate measures are applied to assess, manage and minimise risk. This group comprises representatives from compliance, procurement and our human rights practice.

As a regulated provider of legal services and employer of predominantly professionally qualified and highly skilled people, the risk of modern slavery within our business is considered low. We apply robust policies and procedures concerning employment screening (including work eligibility checks) and employment conditions (including our LLW commitments).

As noted above, the majority of our suppliers supply standard office goods or services. We recognise there are supplies involving potentially higher risk (for example, supplies of food and drink and promotional products) and some services involving relatively high levels of contracted labour. Individual offices maintain their own databases of first tier suppliers, and we are working to centralise this information and to integrate it into existing firm-wide systems in order to further increase control and coordination.

Suppliers are risk assessed and categorised taking into account the nature of their business as well as country of operation, and product and industry characteristics. Suppliers categorised as presenting significant risk of modern slavery are subject to additional due diligence, primarily based on public sources of information including checks of their own modern slavery and human trafficking statements where applicable, and any other published policies and procedures. Where, following additional due diligence and checks, a supplier is still assessed as presenting a significant risk of modern slavery or failing to meet our standards, they are required to complete a modern slavery questionnaire. The quality and transparency of responses to these questionnaires is assessed.

This risk assessment exercise has been completed in respect of suppliers to all our offices. To date, we have not identified any occurrence of modern slavery in our supply chain, nor have we identified any risks of modern slavery that we have not been able to resolve through additional due diligence or engagement with the supplier.

We have developed a Supplier Code of Conduct which applies to our providers of goods and services and sets out the standards we expect them to observe, including in respect of modern slavery risks. This Code has been introduced for suppliers to our UK offices and is in the process of being introduced for suppliers to other offices. Where our standards are not met, suppliers are expected to take and evidence remedial steps to ensure their activities in our supply chain are free from modern slavery, timely considering what approach will result in the safest outcome for potential victims and enhance supplier behaviour.

Education and training

We have developed training programmes to provide the skill and knowledge to those staff responsible for procurement to recognise the key issues and risks and how these must be addressed. This training has been undertaken by key personnel in our UK offices and by office managers in our other international offices, who are generally responsible for contracts and relationships with suppliers. We are committed to promoting and maximising awareness of modern slavery risks across our

organisation, and an online education module on human rights is available to all staff regardless of their role.

In order to detect any modern slavery in our business or supply chains any concerns to be reported without delay or fear of detrimental treatment. Our modern slavery policy requires anyone who becomes aware of, or suspects modern slavery in our business or supply chains to report it to the firm's General Counsel or, if they wish to report anonymously, they may do so as set out in the firm's global whistleblowing policy.

Next steps

In 2018, we conducted an audit of our existing measures to address modern slavery risks. Although we concluded that our existing measures are robust, we identified a number of improvements to our supply chain due diligence and risk assessment process which we are in the process of implementing. Further audits and reviews will be undertaken periodically adopting a risk-based approach.

We will continue to make efforts to identify any significant risks in our business and supply chain and implement any actions appropriate or necessary directly with suppliers. We are currently considering the adoption of appropriate key performance indicators to monitor and report upon future performance.

Board approval

This statement has been approved by the board of Hogan Lovells International LLP on behalf of its members, by the members of Hogan Lovells (Paris) LLP, and by the board of directors of Hogan Lovells Services.



Leopold von Gerlach, designated member, on behalf of Hogan Lovells International LLP



Susan Bright, director, on behalf of Hogan Lovells Services

A handwritten signature in black ink that reads "Susan Bright". The signature is written in a cursive style with a horizontal line underneath the name.

Susan Bright, member of Hogan Lovells International LLP as member, on behalf of Hogan Lovells (Paris) LLP



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