

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

November 2018

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 2017 to 30 April 2018.

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](#) 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 is 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 MSA compliance in our due diligence process for suppliers.
- ▶ When short-listing 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.

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, for Addleshaw Goddard and any appropriate regulator, into our contracts, to ensure that we can monitor the supplier's compliance with key elements of the contract.
- ▶ Through our on-going supplier engagement activities we continue to emphasise the importance of transparency and compliance in regards to 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 undertaken by our Central Procurement team.
- ▶ Refresher training is available for existing team members and Modern Slavery is included as part of induction training for new team members.

Reporting:

- ▶ Where instances or any potential risks of Modern Slavery are identified with 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, Hong Kong, Leeds, London, Manchester, Muscat, Singapore and
Tokyo*

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