MODERN SLAVERY ACT
TRANSPARENCY STATEMENT

September 2020

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 Addleshaw Goddard affiliated undertakings which offer legal services and the jurisdictions in which they operate, are available on the Addleshaw Goddard website.

This statement relates to actions and activities during the financial year 1 May 2019 to 30 April 2020 and was approved by the Addleshaw Goddard LLP Board on 30 September 2020.

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 across the whole group, worldwide.

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 Code of Conduct 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

● The Firm’s Head of Procurement is spearheading a project to review the current procurement processes with a view to developing a new procurement strategy and implementing process improvements to deliver on the strategic goals. Identifying and eradicating Modern Slavery in our supply chain forms part of that review.

● The due diligence which we carry out on our suppliers, including the data requested regarding Modern Slavery and the assessment of the data received from our suppliers, is currently being reviewed as part of the larger procurement strategy and processes project. Accordingly:
  ○ we are including more specific questions on practices which may suggest Modern Slavery in our due diligence questionnaire; and
  ○ when shortlisting suppliers or re-running due diligence on incumbent suppliers, any concerns regarding Modern Slavery are raised with the supplier and escalated within our business.

● We are developing a Risk Matrix as part of the larger procurement strategy and processes project which allows for more objective and consistent scoring of suppliers (High; Medium; Low) and triggers periodic due diligence commensurate with the levels of risk identified. Currently, we update our due diligence on high risk suppliers annually and, for our medium risk suppliers, as part of the contract renewal process.

● Particular attention is being given to AG businesses operating in jurisdictions outside of the UK and EU, where we have identified a higher risk of Modern Slavery in the supply chain than for the UK- and EU-based offices. Raising awareness of Modern Slavery is achieved by including Modern Slavery on the agenda for non-UK/non-EU office visits, undertaken by our Head of Premises, Client and Office Services, and by introducing a checklist dealing specifically with identifying risks of Modern Slavery where suppliers are being engaged outside of the central procurement process.

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 our General Counsel & Risk team 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 to determine the appropriate action(s) to be taken.

SIGNED

CHARLES PENNEY
Senior Partner