

SLAUGHTER AND MAY /

MODERN SLAVERY - SLAVERY AND HUMAN TRAFFICKING STATEMENT

30 OCTOBER 2023

Slaughter and May is a leading international law firm, providing a full and extensive range of legal services to a diverse range of clients.

We seek excellence in every aspect of our business and are committed to the highest standards of professionalism, ethics and integrity. We are committed to conducting our business in a lawful manner and this includes engaging with our suppliers to support them in working against modern slavery.

As required by the Modern Slavery Act 2015 (the "Act"), this statement describes the steps which Slaughter and May has taken during the financial year ended 30 April 2023 and beyond to ensure that slavery and human trafficking is not taking place in any of our supply chains, or in any part of our own business. Slaughter and May Services Company, the in-house company that we use to engage our staff, has a separate [statement](#).

Business model

In London we practise through a general partnership which also has offices in Brussels and Beijing. In Hong Kong we practise through a separate partnership. For further information about our business model, including how we are regulated, see the [Legal and Regulatory Information](#) on our website.

Supply chain relationships

Our key suppliers are the businesses which help us to run our premises, such as our catering, cleaning and security providers, or who supply us with the technology we need to deliver our legal services to our clients as well as recruitment agencies who provide us with both legal and business services staff who are key to our operations.

We tend to foster long-term relationships with these first-tier suppliers with regular renewals of contracts to ensure we actively reassess their services and to help us work with suppliers to strengthen their approach. We also avoid making demands of our suppliers that might lead to them violating human rights. For example, we require our catering, cleaning and security suppliers to pay their personnel, who work at our London premises, a salary which is equivalent (at least) to the London Living Wage. The London Living Wage reflects the high cost of living in the capital and is higher than UK employers are required to pay by law.

Supplier Code of Business Conduct

We expect our suppliers to have fair employment practices, as articulated in our [Supplier Code of Business Conduct](#). This encourages our suppliers to conduct their businesses ethically and we ask key suppliers to sign it to make their commitment to fair employment practices clear. A supplier's compliance with our Supplier Code of Business Conduct is an important factor in us deciding whether to form, continue or renew a relationship with them. Any breach of our Code by a supplier, including not having fair employment practices which prohibit modern slavery, may result in us terminating our arrangements with the supplier. Our standard supplier contracts also include specific obligations on modern slavery.

As well as our own offices, we have close working relationships with other leading law firms across the world. However, we have no exclusive alliance with other law firms and are therefore independent and able to work alongside the lawyers selected by our clients in any jurisdiction. Ordinarily our clients engage their lawyers directly but, occasionally, we may do so on their behalf. If this is done on a sub-contracted basis, we generally send them a copy of our Supplier Code of Business Conduct.

Supplier training

We previously held a “Supplier Symposium” at our offices, with a programme which included training for our key suppliers on the requirements of the Act as well as our own ethical expectations in this area. Following the success of this event a further hybrid event will be held in early-2024.

Internal training

We provide training to our employees who have responsibilities in relation to engaging the firm’s suppliers, most recently in July 2023. This covers not only the offences in the Act, but how to go about evaluating suppliers and mitigating risks within supply chains. Our aim is to raise awareness of the issues and increase informed scrutiny.

In March 2023, Stronger Together (not for profit organisation) provided a firmwide training session: “What is modern slavery and how you can help stop it”. The session addressed what is meant by modern slavery, the extent of the problem in the UK and globally and how the firm’s staff can spot the signs and use this knowledge in their role at work and day-to-day life.

We also ran a firmwide training session in March 2023 on modern slavery and human trafficking focused on business and human rights. This training provided an overview of current and anticipated changes to human rights legislation as several jurisdictions move from voluntary guidelines and standards to ‘hard’ legal requirements in this area . It covered obligations for businesses to identify, prevent and mitigate adverse environmental and human rights impacts of their activities, including under the EU’s Corporate Sustainability Reporting Directive and Corporate Sustainability Due Diligence Directive, as well as the EU’s draft Forced Labour Regulation and proposed changes to the current UK Modern Slavery regime.

The firm intends to run a further programme of modern slavery training in 2024.

Risks

As a regulated legal service provider operating within a strict ethical framework, we consider the risk of modern slavery or human trafficking to be greater within our supply chains than our own business.

We try to identify risks to workers in our supply chain by regularly refreshing the due diligence we carry out on our key suppliers before we engage them and through the ongoing supplier management processes we have in place.

When selecting our suppliers, price is not our only driver. We are committed to buying quality products and services from ethical suppliers and part of measuring this involves assessing the approach a potential supplier takes to its people and the workers in its own supply chain. At the start of 2023 we published the latest version of our internal “Supplier Relationship Management Guide”, which stresses this point, with the next version of this due by the end of 2023.

At the start of 2023, we revisited our modern slavery risk mapping across our supply chain to assess where modern slavery was most likely to arise. This assessment considered a range of factors including the jurisdiction of the supplier, their own supply chain, and the business sector. All those suppliers identified as higher risk will be individually approached for discussion and, in some cases where deemed appropriate, an additional audit on this area will be carried out. The purpose of this is to work with our suppliers and influence their approach positively.

Performance indicators

We generally meet formally with each of our key suppliers at least annually and, among other things, address their approach to slavery and human trafficking at those review meetings. We use contract management software to interrogate our contractual terms (including those dealing with the Act) with suppliers more easily.

In addition, managers responsible for the firm’s relationship with key suppliers visit them at their own premises from time to time, and at times on short notice. This gives us an opportunity to observe first-hand their working conditions and to talk to a sample of their workers direct. In many cases, we have a contractual right to audit the performance and working practices of our suppliers.

Further to our most recent supplier risk mapping exercise, we have developed our Contract Management System by creating a Supplier Relationship Management feature which specifically asks questions that can form part of a Supplier Review process. This includes assessing and scoring our significant suppliers' approach to modern slavery. This feature will allow us to rate their respective performance and seek continual improvement from them. In 2023 we piloted the process with our key suppliers and found that, of those that fall within scope of section 54 of the Act, 100% publish an annual statement and 97% provide training or education to their staff on slavery, servitude, forced or compulsory labour and human trafficking. We will start on extending this feature to all suppliers in the forthcoming year and integrating it into our process for all new supplier on-boarding and tenders.

Our own business initiatives

Code of Business Conduct

Our commitment to fair employment practices in relation to our own employees is embodied in our [Code of Business Conduct](#). This provides information about how we approach our day-to-day activities and the principles in it are covered in inductions for new staff and reinforced through training. The standards in the Code are reflected in our policies and procedures and we endeavour to embed them in everything we do.

UN Global Compact

We are signatories to the United Nations Global Compact. This commitment includes our support of the Ten Principles of the Compact, which covers human rights, labour, environment and anti-corruption. It also includes promotion of the Sustainable Development Goals, of which Target 8.7 (under SDG8 - Decent work and economic growth) explicitly addresses forced labour, modern slavery and human trafficking.

We publish an annual [Communication on Progress](#) (or our 'Responsible Business report') as a signatory to the United Nations Global Compact. The report covers the firm's work with suppliers, its engagement with clients, its culture and how it supports employees, as well as its carbon reduction ambitions, its pro bono work and support of the community. The firm's supplier engagement, ethics and culture of integrity are central to ensuring that slavery and human trafficking is not taking place in the firm's supply chains.

In 2021, we launched six priority Sustainable Development Goals for the firm, which includes a focus on modern slavery under Goal 8, decent work and economic growth. In April 2023 the firm established the "SDG Working Group" with the aim of setting measureable targets for the firm in line with our commitment to support the Sustainable Development Goals. The Working Group is comprised of individuals from across the firm to embed further sustainable practices in the business.

Employee engagement

We promote key responsible business activities throughout the year and aim to engage everyone in the firm with our responsible business commitments and our progress to integrate responsible business into our operations and supply chain. In July 2023, following extensive employee consultations during 2022, we launched our [Values](#) – the highest standards, independence of thought, collective endeavour and respect for all. These values sit as part of a framework that represent our commitments to four stakeholder groups: our clients; our people; the firm; and society.

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