

Modern slavery - slavery and human trafficking statement

1. Introduction

- 1.1 As required by the Modern Slavery Act 2015 (the “Act”), this statement describes the steps which Slaughter and May has taken during the last financial year (1 May 2025 to 30 April 2026) to seek to ensure that modern slavery and human trafficking are not taking place in any part of our supply chain, or in any part of our business. In this statement, references to “modern slavery and human trafficking” are to the conduct described in sections 1 to 3 of the Act (and to “slavery and human trafficking” as defined in section 54(12)), and references to “us”, “our”, “we” or the “firm” are references to Slaughter and May.

2. Business, organisational structure and supply chains

- 2.1 Slaughter and May is a leading international law firm, providing a full and extensive range of legal services. We are committed to maintaining the highest standards in every aspect of our business, including in our supply chain.
- 2.2 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.
- 2.3 Slaughter and May Services Company (“SMSC”) is a company wholly owned by the partners of Slaughter and May. It is an in-house company and is used to engage our staff in London and Brussels and to arrange the secondment of individuals to and from the firm. As of 30 April 2026, SMSC employed more than 1,000 legal and business services staff. SMSC has a separate Modern Slavery Statement, available [here](#).
- 2.4 Slaughter and May’s supply chain is predominantly focused on running our premises and supporting the delivery of legal services. Our key suppliers include our catering, cleaning and security providers, the businesses that supply the technology we need to deliver legal services to our clients, and the recruitment agencies which provide our legal and business services staff (the “Key Suppliers”).
- 2.5 We also frequently work in partnership with other law firms so our clients can be advised on multi-jurisdictional matters. This approach is fundamental to our business model. Ordinarily clients engage these other law firms directly, but from time to time we will do this on behalf of our clients, on a sub-contracted basis.

3. Policies

- 3.1 **Sustainability Report** – We publish an annual [Sustainability Report](#) (formerly the Responsible Business Report) which outlines the progress made against the UN Sustainable Development Goals, focusing on the six priority goals where

we can make the greatest contribution. We are a signatory to the United Nations Global Compact. This commitment includes our support for the Ten Principles of the Compact, which cover human rights, labour, environment and anti-corruption. The Sustainability Report is prepared annually by our Responsible Business department, in coordination with other business services staff.

- 3.2 **Supplier Code of Business Conduct** – Our suppliers are expected to have fair employment practices which comply with the law, and not to engage in any practices that are known to contribute to the risk of modern slavery and human trafficking. Our [Supplier Code of Business Conduct](#) requires suppliers to ensure that their sub-contractors comply with the standards described in this Code. The majority of our suppliers have agreed to comply with the Code and we generally embed obligations to comply with it in our supplier contracts. Where a supplier does not adopt the Code, we will seek assurances from the supplier that its own code of conduct contains equivalent standards. Compliance with the Code (or equivalent standards) forms part of the firm's supplier selection criteria.
- 3.3 **Code of Business Conduct** – Our commitment to fair employment practices in relation to our own employees is embodied in our [Code of Business Conduct](#). The Code is underpinned by our [values](#) – the highest standards, independence of thought, collective endeavour and respect for all. The importance of the Code of Business Conduct is outlined in inductions for new staff, reinforced through training for existing staff and reflected in the firm's policies and procedures. The Code of Business Conduct provides that our partners and staff must: reject bribery and corruption; not facilitate criminal conduct by another person; play a role in combatting financial crime; respect all employment rights and protections including those aimed at eliminating slavery, servitude, forced or compulsory labour and child labour; and treat others fairly and with dignity and respect.
- 3.4 **Supplier Due Diligence policy** – Our approach to supplier due diligence is set out in the firm's Procurement Guide, which sets out the checks Contract Owners are required to undertake for new and existing suppliers of the firm. As part of this process, suppliers may be required to complete a Supplier Due Diligence Questionnaire to assess key areas of risk and compliance. Details of the required checks and questionnaire process are set out in paragraph 4 below. This guidance is available to partners and staff on our intranet and is reviewed annually by our Procurement department.
- 3.5 **Whistleblowing (raising concerns) policy** – The firm's internal whistleblowing policy requires partners and staff to raise concerns relating to possible criminal offences, breaches of the law, serious breaches of firm policy or procedure, any aspect of the firm's operations or premises which may endanger someone's health or safety, or any other matter of concern. Partners and staff may raise concerns in confidence (unless the firm is required to comply with a competing legal or regulatory obligation). We will not tolerate victimisation of anyone who raises a concern of suspected wrongdoing. This policy is reviewed annually by our HR department.

4. Risk assessment and due diligence processes for suppliers

- 4.1 We are an SRA-authorised and regulated legal services provider operating within a strict ethical and regulatory framework. Accordingly, the firm considers the risk of modern slavery or human trafficking occurring within its business to be low. However, we recognise that the risk is heightened within our supply chain. For this reason, this modern slavery statement focuses on our due diligence processes in relation to our supply chain. SMSC has a separate Modern Slavery Statement (see paragraph 2.3 above), which describes its recruitment due diligence processes.
- 4.2 The firm generally regards its labour-intensive, on-site business services suppliers, which include our Key Suppliers, as being at higher risk of modern slavery and human trafficking.
- 4.3 Our Procurement Guide requires the Procurement department and Contract Owners to consider the potential risks associated with engaging new suppliers at the outset of each procurement project, and to re-assess existing suppliers (subject to the risk tier – see paragraph 5.1 below) when a contract is due for renewal, if there is a change of control of

the supplier, or on a regular basis for longer-term contracts. This includes identifying whether there is an increased risk of modern slavery or human trafficking, for example due to the nature of the goods or services being procured or the jurisdiction involved. Contract Owners cooperate with the Procurement department as necessary in carrying out their risk analysis and in determining whether further due diligence is needed.

- 4.4 Contract Owners are required to conduct adverse media checks at the outset of all procurement projects. Our Procurement department also conducts regular adverse media checks for our catering, cleaning, security and engineering providers, as well as our on-site design agency.
- 4.5 Key Suppliers, and other suppliers identified as being higher risk under the approach described above, must complete a Supplier Due Diligence Questionnaire to demonstrate that they meet the standards we expect in respect of human rights and fair working practices. The questionnaire asks, among other things, whether the supplier publishes an annual modern slavery statement, adopts practices known to contribute to the risk of modern slavery and human trafficking (for example, retaining workers' identity documents or preventing workers from leaving the workplace during non-working hours) and provides training or education to staff on modern slavery and human trafficking. Contract Owners are encouraged to include a contractual audit right to monitor the performance and working practices of a supplier where the due diligence conducted during the selection process has identified a potential risk area, including in relation to modern slavery.
- 4.6 We are accredited by the Living Wage Foundation as a Living Wage Employer and require our on-site catering, cleaning, engineering and security suppliers in our London office to pay their personnel at least the London Living Wage. The London Living Wage reflects the higher cost of living in the capital and is higher than the statutory National Minimum Wage and National Living Wage rates that UK employers are required to pay by law.
- 4.7 The firm maintains a legal supplier questionnaire for overseas law firms with which we work with frequently, which asks for confirmation that they have policies and procedures in place to help them prevent modern slavery and human trafficking within their own operations and supply chains, and that they operate in a manner consistent with the spirit of our Code of Business Conduct. The questionnaire is issued to those firms we work with in Europe, the US, APAC and other markets, and their responses are reviewed by our Compliance team. If our due diligence should cause us to suspect that modern slavery or human trafficking may have occurred within a law firm's supply chain, we will investigate the matter. If instances of modern slavery or human trafficking are subsequently confirmed, we will engage with that law firm to discuss appropriate remediation measures and, where necessary, terminate our arrangements with it.

5. Additional risk management practices

- 5.1 We have embedded a supplier tiering framework within our source-to-contract process to support effective supply chain risk management. All proposed services are assessed through a Service Risk Questionnaire, with the results reviewed at our Procurement Risk Tiering meetings. Each supplier engagement is assigned to one of five risk-based tiers, taking into account factors such as risk profile, data access, operational dependency and spend. The assigned tier determines the level of due diligence, governance oversight and ongoing supplier management required, helping us identify, assess and mitigate risks within our supply chain.
- 5.2 Contract Owners are required to meet formally with Key Suppliers on a regular basis and, among other things, address their approach to modern slavery and human trafficking at those review meetings. Where there are areas for improvement in a supplier's approach to modern slavery and human trafficking, based on their responses to the Supplier Due Diligence Questionnaire, Contract Owners and the Procurement department are encouraged to monitor the supplier's progress and work with them to strengthen their approach.
- 5.3 The Responsible Business Committee is responsible for overseeing the development and implementation of our environmental, social and governance ("ESG") strategy, including its implementation across our operations. The

Committee reports annually to the Partnership Board on progress against the ESG objectives. Its membership includes our Managing Partner, Chief Operating Officer, Director of Sustainable Business and partner representatives. The Responsible Business Committee oversees progress in respect of the firm's controls to prevent modern slavery and human trafficking from occurring within our supply chain.

6. Supplier engagement

We recognise that combatting modern slavery requires us to work collaboratively with our suppliers. We are committed to working with our suppliers to enhance our knowledge of their practices so that we can actively work with them towards building ethical and sustainable supply chains. We do this by encouraging open dialogue with our suppliers, sharing best practice and educating ourselves on this issue.

7. Effectiveness and performance indicators

Through our due diligence and monitoring processes, as described in this statement, we did not identify any instances of modern slavery or human trafficking within our business or supply chain during the financial year ended 30 April 2026.

8. Training

- 8.1 We plan to provide training on modern slavery and human trafficking to our Key Suppliers in 2027 as part of our supplier relationship management programme.
- 8.2 We have delivered training on modern slavery risks across the firm, including to all new joiners.

Signed by:

David Johnson, Managing Partner

Date: 27 October 2026