

Anti-Slavery and Human Trafficking Statement 2016

This statement is made by Eversheds Sutherland. It is a statement made in accordance with Section 54 of the Modern Slavery Act 2015 and covers the financial year from 1 May 2015 to 30 April 2016.

Eversheds Sutherland is one of the largest full service law firms in the world and provides legal and consultancy services across 25 offices in the UK and internationally. Eversheds Sutherland had an annual turnover in 2014/2015 of £379 million and employs circa 2800 people in our UK and international operations. To find out more about what we do and our values, please go to our [about us](#) page. We know that slavery, human trafficking, servitude and forced labour (Modern Slavery) is a global and increasing challenge for governments and business. Eversheds Sutherland has been at the forefront of providing advice and guidance to UK and international businesses through the delivery of training, webinars and thought leadership events. Eversheds Sutherland have acted as an expert advisor to Shift and the Equality and Human Rights Commission in producing top level guidance to assist companies identifying, mitigating and reporting on their human rights impacts and activities. Our comprehensive survey "[Human rights at work – on the right path](#)" assessed levels of business engagement with human rights and the awareness and knowledge regarding new reporting obligations and provides guidance to companies reporting on human rights within their operations.

Our Policies on Slavery and Human Trafficking

As a business we recognise our responsibility to be aware of the risks of Modern Slavery within our own organisation and supply chain. We have, therefore, taken the following steps:

- In October 2016, we introduced a new Anti-Slavery and Human Trafficking Policy. Our policy outlines our zero tolerance approach to Modern Slavery of any kind within our operations and supply chain and has been approved by the Partnership's Executive. Our policy sets out the standards we expect of everyone working with us or on our behalf to support and uphold our policy commitments and provides guidelines for employees, partners and agency workers to report any suspicions or concerns relating to compliance with the policy;
- We also have a clear whistleblowing policy which is published on our intranet site and if there are any concerns relating to Modern Slavery these concerns can be raised in confidence without fear as part of our whistleblowing procedure. Our whistleblowing policy has been modified to take account of the Modern Slavery Act 2015. All reports of Modern Slavery will be fully investigated and appropriate remedial actions taken.

Risk Assessment Processes

Reflecting the United Nations Guiding Principles on Business and Human Rights, (UMGP's) our due diligence activities to combat slavery and trafficking, described below, are risk based and will in future correspond with the level of risk identified. As such, we have undertaken or begun the following risk assessment processes during the period to inform our due diligence approach:

- We have undertaken a supply chain risk assessment of Eversheds Sutherland Modern Slavery risks with over 5,000 suppliers to develop a prioritisation list of high risk suppliers in respect of modern slavery areas. We assess risk using key information such as the supplier type and geographical location and we have also reviewed independent and regulatory employment risk assessment resources . The results have produced supplier risk ratings enabling us to prioritise future due diligence within our supply chain.
- In addition our tier 1 contractors, selected on the basis of contract size and revenue, are all established businesses who are required to comply with the Modern Slavery Act reporting obligations in their own right.

Due Diligence Processes

In order to seek to prevent slavery and trafficking in our business and supply chains we have begun a due diligence process during this period. Steps undertaken or begun include:-

- The publication and adoption of a Supplier Code of Conduct on Slavery and Trafficking. This has been published on our intranet and as indicated above has been communicated to main contractors who have been asked to confirm that they will make a commitment to comply with the standards set out in the Code.
- From October 2016 onwards, new third party relationships will be subject to specific questioning regarding compliance with the Modern Slavery Act and our Code of Conduct and we are modifying our procurement procedures to address the risk of slavery and trafficking. We have also updated our contractual terms to include appropriate Modern Slavery provisions.
- We will be reviewing any potential higher risk relationships based on our risk assessment process outcome and determining the extent to which it is appropriate to take any further precautionary measures to minimise the risk of slavery and trafficking where we have a direct relationship with those organisations.

Training to raise awareness of Modern Slavery and Human Trafficking

We are in the process of training our key staff on Modern Slavery and on the requirements of our Anti-Slavery and Trafficking Policy and the Supplier Code of Conduct. We have also trained them in relation to anti-slavery and trafficking due diligence in the procurement process. Eversheds Sutherland has also engaged the services of a third party consultant to work with us to develop human rights training and to produce a guide for our Corporate and Commercial lawyers to raise awareness of the UNGP's and human rights issues when advising on corporate due diligence.

Measuring Effectiveness – Performance Indicators

In order to monitor the effectiveness of the steps we have taken to seek to prevent slavery and trafficking taking place in our business and supply chains we intend to:-

- Review the effectiveness of our Anti-Slavery and Trafficking Policy and Supplier Code of Conduct;
- Ensure that all key staff are trained in relation to the Modern Slavery Act and slavery and trafficking risks on an ongoing basis.
- Develop appropriate systems to ensure that we engage appropriately with medium and higher risk suppliers based on our risk assessment process, to ensure they are aware of Eversheds Sutherland's zero tolerance approach to Modern Slavery whilst ensuring that we take appropriate measures to encourage and persuade them to adopt their own measures to minimise the risks of slavery and trafficking within their own organisations;
- Monitor and consider responses of those suppliers with whom we correspond to raise awareness of the Modern Slavery Act and to explain our policy commitments and the obligations under our Code of Conduct on slavery and trafficking.
- Assess and consider the appropriateness of developing further measures including audit with specific suppliers where we assess that there may be a heightened risk of slavery and trafficking within those organisations;