

Anti-Slavery and Human Trafficking Statement 2017

This statement is made by Eversheds Sutherland (International) LLP and Eversheds Sutherland Legal Services Limited. It is a statement made in accordance with Section 54 of the Modern Slavery Act 2015 and covers the financial year from 1 May 2016 to 30 April 2017.

Eversheds Sutherland (International) LLP and Eversheds Sutherland Legal Services Limited sit under the Eversheds Sutherland brand. To find out more about our structure, what we do and our values please go to our [about us](#)

Our business is office-based and our primary supply chain categories support these operations.

We know that slavery, human trafficking, servitude and forced labour (“**Modern Slavery**”) is a global and increasing challenge for governments and business. Eversheds Sutherland (International) LLP has been at the forefront of providing advice and guidance to UK and international businesses. This has included:

- Developing two e-learning modules to raise awareness of the issues;
- Partnering with a leading charity countering modern slavery and generating income for them through the sales of our e-learning modules;
- Organising thought leadership events including:
 - an event (Tools and implications for business one year on) with Rt Hon Fiona Mactaggart MP (then Chair of the Commons Select Committee) for tackling modern slavery and Nicholas Griffin QC; and
 - an event with Sir David Metcalf (Director of Labour Market Enforcement);
- Bespoke training to in-house procurement, legal and compliance teams in various sectors;
- Assisting clients with risk assessments of their organisational and supply chain risks and making recommendations; and
- Webinars and briefings on modern slavery and business and human rights to local business networks through LexisNexis and at conferences and in-house counsel events.
- Eversheds Sutherland (International) LLP has 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

- Eversheds Sutherland (International) LLP and Eversheds Sutherland Legal Services Limited recognise their responsibility to be aware of their organisational and supply chain Modern Slavery risks. 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 firm'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;
- Revised our whistleblowing policy to provide a mechanism for reporting any concerns relating to Modern Slavery in confidence. This policy is published on our intranet site; and
- Introduced and published internally our Supplier Code of Conduct on Slavery and Trafficking.

Risk Assessment Processes

- Reflecting the United Nations Guiding Principles on Business and Human Rights ("UNGP's") we recognise that due diligence activities to combat slavery and trafficking are required across our supply chains and the need for a consistent risk based approach to be adopted. In 2016 we carried out a supplier risk profiling programme and we identified the following risk categories to assess heightened risks of modern slavery:
- Supplier type – cleaning, catering, facilities management, travel, IT support/equipment and professional services;
- Geographical location;
- The availability of documentation evidencing the supplier's compliance procedures; and
- Supplier willingness to provide contractual assurances.

Due Diligence Processes

- We are undertaking in full or in part the following:
- The updating of our contractual terms with suppliers to include appropriate Modern Slavery provisions;
- The inclusion of a statement on our commitment to Modern Slavery in our standard terms of engagement with our clients;
- The requirement for suppliers to provide, where required, documentary evidence of their compliance with the Modern Slavery Act;
- Confirmation from suppliers that they have read and will comply with our Supplier Code of Conduct and Anti-Slavery and Human Trafficking Policy; and
- Upfront questioning of suppliers during the tender process and a programme of post appointment reviews of compliance.

Training to raise awareness of Modern Slavery and Human Trafficking

- Training has been given to members of staff on Modern Slavery and on the requirements of our Anti-Slavery and Trafficking Policy and the Supplier Code of Conduct.
- We have 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. That training has been rolled out to the relevant lawyers.
- Going forwards, key staff will also be required to undertake our modern slavery e-learning which we reference elsewhere in this statement.

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 are or will be:
- Regularly reviewing the effectiveness of our Anti-Slavery and Trafficking Policy and the Supplier Code of Conduct;
- Testing the awareness of staff on the risks of Modern Slavery and the firm's internal processes to address this, as part of a rolling risk and training programme;
- Continuing to monitor and consider responses of those suppliers with whom we have and are corresponding with in relation to our Modern Slavery requirements;
- Continuing with our post appointment audits of suppliers;
- Introducing an annual rolling audit of suppliers; and
- Continuing with our supplier risk profiling programme.