

Anti-Slavery and Human Trafficking Statement 2019

This statement is published on behalf of Eversheds Sutherland (International) LLP and Eversheds Sutherland Legal Services Limited (the employing entity of Eversheds Sutherland (International) LLP), which have a turnover in excess of £36m. References in this statement to “we”, “us” and “our” are to both. The statement is made in accordance with Section 54 of the Modern Slavery Act 2015 (“the Act”) and covers the financial year from 1 May 2018 to 30 April 2019. This statement is published on behalf of Eversheds Sutherland (International) LLP and Eversheds Sutherland Legal Services Limited (the employing entity of Eversheds Sutherland (International) LLP), which have a turnover in excess of £36m. References in this statement to “we”, “us” and “our” are to both. The statement made in accordance with Section 54 of the Modern Slavery Act 2015 (“the Act”) and covers the financial year from 1 May 2018 to 30 April 2019.

Eversheds Sutherland is a global law firm with offices and related entities across the world. It employs 3570 people worldwide and operates in England and Wales through Eversheds Sutherland (International) LLP, a limited liability partnership registered in England and Wales. To find out more about its structure, what it does, and its values please click [here](#).

As an office-based professional services organization we work with a range of suppliers. Our top areas of spend with suppliers are property and facilities management, and technology, with our spend being highly concentrated with our large tier 1 suppliers.

Our Approach to Modern Slavery

The Act defines modern slavery as slavery, servitude, forced and compulsory labour and human trafficking. There were an estimated 40.3 million people in slavery globally in 2016. In accordance with the United Nations Guiding Principles on Business and Human Rights (“UNGPs”) we recognize that combating slavery and trafficking requires a strict approach to due diligence activities and for a consistent risk based approach to be adopted across our business and our supply chains.

Our approach to Modern Slavery

Modern slavery is a human rights violation and the worst impacts of it are borne by its victims. Victims can suffer often catastrophic physical and mental health issues and even death at the hands of those that enslave and traffic them. We have a zero-tolerance approach to modern slavery in our organization and our supply chains and we take our obligations in relation to the prevention, detection and reporting of slavery and human trafficking extremely seriously. Our responsibility extends to ensuring that we do all that we can to ensure that our business does nothing to facilitate the slavery, servitude or exploitation of any individuals involved in our business or supply chains.

In our Business

We have a zero-tolerance approach to modern slavery in our organisation or our supply chains. We make it clear within our [Anti-Slavery and Human Trafficking Policy](#) and in the training delivered to staff that the prevention, detection and reporting of modern slavery in any part of our organization or supply chain is the responsibility of all those working for us or on our behalf. This policy is, and will continue to be, reviewed regularly and amended when necessary. The latest amendments were made in October 2018. The policy is also shared with all our suppliers.

As part of our due diligence process, we make sure key suppliers are aware of our policies, and adhere to the same high standards. As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we require potential key suppliers to complete a questionnaire during our procurement process which provides details of their own record in ensuring that there is no modern slavery in their business or supply chain. In a full tender exercise a second questionnaire is sent requiring further information regarding compliance with the Act.

Once a key supplier has been approved, we require them to provide documentary evidence of their compliance with the Modern Slavery Act and a contractual undertaking that they will comply with our Supplier Code of Conduct and Anti-Slavery and Human Trafficking Policy.

Having completed a supplier risk profiling program and identified the areas of our business where there may be heightened risks of modern slavery, we have developed an improved rolling audit or 'health check' of high risk suppliers. That process has been reviewed and updated in the last 12 months.

We assess the risk of modern slavery in our business and supply chain against the following criteria:

- supplier type
- geographical location
- what the supplier tells us about the measures they have taken to ensure there is no modern slavery in their business and supply chain

We have monitored and assessed those property and facilities suppliers deemed to be at the highest risk based on the above criteria through monthly, quarterly, and annual governance meetings with those suppliers.

We ensure that our staff are aware of our approach to Modern Slavery by having a dedicated intranet page to enable and empower our staff to assist us in enforcing compliance with our Policy and our Supplier Code of Conduct. That page also contains links to our training on Modern Slavery so that they are able to review this whenever required.

We will not tolerate slavery and human trafficking within our supply chains. To that end, in the last 12 months we have updated the terms included within our contracts on this.

In the Wider Community

Throughout 2018 we continued to take part in The Law Firm Peer Learning Process to ensure that we and others within our industry have advanced our efforts to implement respect for human rights, driven increased engagement of the legal profession, established communities of practice and supported the legal profession and their clients in addressing human rights issues. That involvement culminated in a final report being delivered in January 2019.

We have also continued to be a leading provider of training and advice to our clients on the topic of modern slavery and have a designated [Human Rights and Modern Slavery Hub](#) on our website which demonstrates some of our work in this area. In the last 12 months we have raised over £5,000.00 for a leading charity countering modern slavery through the sales of our e-learning modules.

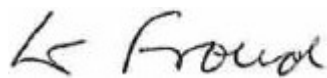
Our Ongoing Commitment

We remain committed to ensuring that there is no Modern Slavery within our business or our supply chain. Our plan for the next twelve months includes:

- Delivering revised training to all our employees on identifying and reporting any concerns regarding modern slavery
- Revising our due diligence process to include additional questions within our questionnaires and require additional documentary evidence of our suppliers' commitment to eradicating modern slavery
- Committing to a Service Level Agreement for any and all contact received through our whistleblowing procedures

Approval

This statement was approved by Keith Froud, Managing Partner (International) on 30 October 2019 on behalf of Eversheds Sutherland (International) LLP and Eversheds Sutherland Legal Services Limited.



Keith Froud
Managing Partner International
Eversheds Sutherland (International) LLP and Eversheds Sutherland Legal Services Limited