

Anti-Slavery and Human Trafficking Statement 2020

"At Eversheds Sutherland we are proud of our culture and the values that guide our behaviour. Our [purpose](#) is to help our clients, our people and our communities to thrive, and our commitment to Anti-Slavery and Human Trafficking throughout our supply chain supports this purpose.

As a global top 10 law practice we advise our clients, including multinational corporations and financial institutions, on not only their rights and professional obligations but also on how they can prevent harm, demonstrate ethical leadership and build sustainable operations. We strive to ensure that our business is an industry role model for this approach.

We nurture a culture of transparency and openness and I am pleased to confirm that there have been no examples of Human Trafficking or Modern Slavery identified within our business or our supply chain in the last 12 months.

During these extraordinary times, where COVID-19 has had, and will continue to have, a lasting impact on global supply chains, we will be unwavering in our determination to ensure that we have robust procedures in place to identify and manage the risks of modern slavery and human trafficking."

Keith Froud – Managing Partner – Eversheds Sutherland (International) 30 October 2020

Purpose of this Statement

This statement is made on behalf of Eversheds Sutherland (International) LLP and the employing entity of Eversheds Sutherland Legal Services Limited (together, "Eversheds Sutherland") in accordance with Section 54(1) of the Modern Slavery Act 2015 ("the Act") and covers the financial year of 1 May 2019 to 30 April 2020.

Eversheds Sutherland is a global top 10 law practice with 68 offices across its branches and related entities across the world. It operates as a limited liability partnership registered in England and Wales, owned by our partners, and employs 4,007 people worldwide.

We provide legal and commercial advice and solutions across a number of sectors to our international client base which includes some of the world's largest multinationals. To find out more about our structure, what we do, and our values please go to the [about us](#) section of our website.

We are an office-based professional services organization and we work with a range of suppliers to support our lawyers in delivering those [services](#). Our top areas of spend are primarily with Tier 1 (i.e. direct) suppliers in property and facilities management, human resources and technology who enforce the same strict standards that we expect of ourselves.

References in this statement to "we", "us" and "our" are to Eversheds Sutherland as defined above.

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.

We have a number of policies and procedures to mitigate the risk of slavery or human trafficking occurring in our business or any of our supply chains and to ensure a healthy working environment for all our staff and contractors. These have each been reviewed and, where appropriate updated, this year. These include our Anti-Slavery and Human Trafficking Policy; our central Purchasing Policy and Procedure; our departmental Procurement Policies; our Equality and Diversity Policy, our Health and Safety Policy Statement; our Whistleblowing Policy and the Supplier Code of Conduct which together set out the standards that we expect our people and all who work with us, or on our behalf, to support and uphold. We achieved accreditation with the Real Living Wage Foundation in February 2020, inclusive of people who work for our firm via sub-contractors. These policies are enforced through contractual provisions in our contracts with suppliers and employees.

Within Our Business

At Eversheds Sutherland we are aware that our people are our greatest asset. We were one of the first legal practices to become a signatory of the Mindful Business Charter in 2018 and we continue to find new ways of supporting and empowering our staff including our Open House app, launched in April 2020, to foster greater social bonds during a new period of remote working. Supporting good mental and physical health and employee wellbeing are fundamental to the way that we work and we recognise the role that a positive working environment can play in fostering an inclusive, high performance culture.

To further inform and empower our employees, we designed and delivered a new e-learning module in March 2020 to assist our employees to:-

- raise awareness of Modern Slavery and the various forms that it can take;
- educate our staff in recognising warning signs and what steps to take to report any concerns that they have;
- assist our staff in understanding our policies and how modern slavery can affect our business and our clients

The module was mandatory for all employees and further training for those involved in procurement is planned for this year. We have a dedicated intranet page to enable our staff to review our Policy, the Supplier Code of Conduct and our training on Modern Slavery whenever required.

Due diligence processes

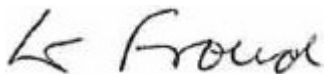
Our due diligence activities reflect the United Nations Guiding Principles on Business and Human Rights ("UNGP's") and we recognise the need for these activities to combat slavery and trafficking. As part of our needs assessment and pre-appointment reviews within tender processes, we establish the risk of our proposed suppliers through a series of questionnaires which provide details of their own efforts to combat slavery and trafficking in their business or supply chain. This is then subsequently reviewed during our annual rolling audits or 'health check' process.

Measuring effectiveness

- 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 the 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;
- Updating our supplier audit process and continuing to liaise with our suppliers in relation to our Modern Slavery requirements; and
- Continuing with our supplier risk profiling programme

Approval

This statement was approved by Keith Froud, Managing Partner International on 28/10/2020 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