

Anti-Slavery and Human Trafficking Statement 2021

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"). It covers the financial year of 1 May 2020 to 30 April 2021.

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

Overview of Eversheds Sutherland

Eversheds Sutherland is a global top 10 law practice with over 70 offices and related entities around the world. It operates as a limited liability partnership registered in England and Wales, owned by our partners and employs over 4000 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 acknowledge that slavery and human trafficking exist in many jurisdictions in which we operate and from which we procure goods or services. We are a professional services firm strictly regulated by professional regulatory bodies in the jurisdictions in which we operate, and our ongoing assessment is that we are at low risk of slavery or human trafficking occurring within our own business. This assessment is based on a number of factors, including that our business is primarily comprised of permanently employed, skilled staff, in a client-focused service sector, regulated within strict ethical frameworks.

Our top areas of spend are primarily with direct suppliers in property and facilities management, human resources and technology. We consider there to be a greater risk of slavery or human trafficking occurring within our supply chains than within our own business.

Our Values and our Staff Conditions

As a global law firm, we strive to meet high standards in everything we do. We are proud of our culture and it is a core value of our business to operate an inclusive and open culture that places respect and support at its core.

It is important to us that we support the health and wellbeing of our people for our communities to thrive. We have an ongoing Wellbeing Programme which focuses on Mental Wellbeing, Physical Wellbeing and Working Well across all of our offices. The programme consists of: an Employee Assistance Programme with free guidance and support available 24/7 365 days a year to help with any personal issues such as stress, anxiety, medical concerns, financial concerns and family / relationship matters; a

Wellbeing and Ability Network to actively explore how the firm can support the wellbeing of our people; and in this last reporting period we have also introduced a Working Well Guide which focuses on wellbeing and supporting our staff with the transition to homeworking during the pandemic and introduced sessions for our staff with a cognitive behaviour therapist to provide practical tools to help our people optimise their wellbeing.

Our commitment to ESG and being a responsible business more broadly is at the heart of the firm's new strategy and we have created a structured programme to support this, ensuring that we are living our purpose of 'helping our clients, our people and communities to thrive'.

Over the past 12 months we have worked to review all our activity across the areas of environmental sustainability, our people strategy and citizenship commitments and our approach to governance, compliance and ethics to understand how we are performing, where the gaps are and what we can do to improve.

In May 2021 we became a participant in the UN Global Compact and, in doing so, have committed to uphold its 10 principles around labour, environment, human rights and anti-corruption as well as reporting on our activities each year. We are also now accredited by the Good Business Charter, having been approved for our commitments to a range of activity including being approved by the Real Living Wage Foundation, fairer hours and contracts, employee wellbeing, employee representation and ethical sourcing.

In the next 12 months we have committed to a number of new initiatives across the ESG agenda including launching a global Ethical Code of Conduct.

Our commitment to act in a professional, open and inclusive way includes our endorsement of the objectives of the Modern Slavery Act by the firm's Executive and the application of our modern slavery programme throughout the firm, as well as our continued effort to work with our suppliers to ensure the right processes, procedures and controls are in place as part of our supply chain.

Progress for the financial year ending 30 April 2021

Policies

We have operational policies relevant to our approach to Modern Slavery and these are subject to continuous review and development. These include our Anti-Slavery and Human Trafficking Policy; our central Purchasing Policies and Procedures, our Equality and Diversity Policy, our Health and Safety Policy Statement, our Whistleblowing Policy, our Supplier Code of Conduct and the Supplier Annual Declaration. These policies are published on the firm's intranet which is available to all employees.

During the reporting period we have updated our Anti-Slavery and Human Trafficking Policy and our Supplier Code of Conduct. The Supplier Code of Conduct is now a standalone document to make it easier for our suppliers to understand and comply. The changes introduce new requirements for example the need to train staff on modern slavery, the requirement to make sure workers are free to file grievances about their treatment without suffering detriment and to ensure that workers are checked and have the right to work and prohibit confiscation of the workers identify and travel documents, in addition to ensuring workers have the freedom to associate with persons of their choosing.

We have also introduced a new Supplier Annual Declaration to help continually improve engagement on Modern Slavery with suppliers.

Training

We have a mandatory firmwide training programme for all of our staff on Modern Slavery. This programme has continued to be rolled out to new starters as part of their induction to ensure all of our staff understand how Modern Slavery might arise in our firm, our supply chain and our clients' businesses, including their global supply chains. We monitor the completion of this training module for all new starters monthly and during the reporting period the completion rate of this module for all new starters was 96%.

During the reporting period we have also provided additional more in-depth training to the relevant parts of the firm who are involved in central procurement, given their involvement with our suppliers. The completion rate of this module was 94%.

Supplier Due Diligence

Our supplier due diligence in the reporting period has focused primarily on our key supplier relationships. We expect our suppliers to adhere to the principles set out in our Supplier Code of Conduct and to require the same standards of their own sub-contractors, suppliers and business partners.

During the reporting period, we have sent our new Modern Slavery Supplier Annual Declaration and our existing Supplier Code of Conduct to a sample of our Tier 1 suppliers (Tier 1 suppliers are the suppliers with whom we have a direct relationship). We continue to work with these Tier 1 suppliers to review their responses and undertake due diligence with them on their current Modern Slavery processes and procedures and we have worked with those suppliers where we consider improvements should be made.

Previously we have required our suppliers to report any breaches of Modern Slavery however as part of our Supplier Annual Declaration exercise above, we identified that two of our Tier 1 suppliers who are large global companies were investigating allegations of breaches of Modern Slavery practices within their supply chain. We have investigated and are satisfied that these suppliers are taking appropriate action to deal with these breaches.

UK Government Modern Slavery Statement

In order to evidence the positive steps we are taking to tackle modern slavery we have submitted our Modern Slavery statement to the Government Modern Slavery Statement Registry for the period of this Annual Statement. A link to the Government Portal is [here](#).

Continuous focus on preventing slavery and trafficking

We continue as a business to focus on improving our methods of preventing slavery and trafficking. We have set out below some of the key steps we will be focussing on in the financial year to 31 April 2022.

Measuring effectiveness - Key Performance Indicators

Modern Slavery working Group

We have set up a Modern Slavery working group with key teams and individuals in the firm to discuss ways to reduce the risk of modern slavery occurring within our business and supply chains. The working group meet regularly and review and feed into the firmwide Modern Slavery action plan.

Supplier Due Diligence KPIs

In order to continually improve our supplier due diligence programme we will:-

1. Further develop our modern slavery risk assessment process, which we will pilot against a selection of our existing Tier 1 suppliers, with a view to rolling the process out more widely across the firm in the financial year 2022/23.
2. Raise awareness of our improved risk assessment process and programme across the firm.
3. Identify a selection of our highest risk suppliers to undertake an audit of their key policies, practices and procedures for tackling modern slavery and work with them where appropriate to help address any areas for improvement.

Training KPIs

1. Prepare and circulate a bespoke training module for our Tier 1 suppliers on the requirements of the Act, as well as our own ethical expectations in this area.
2. Prepare and launch an updated mandatory firmwide training programme on Modern Slavery to keep our staff up to date on Modern Slavery legislation and our updated policies and procedures in place to prevent the occurrence of Modern Slavery in our supply chain.

Approval

This statement was approved by Keith Froud, Managing Partner International on 18/10/2021 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