

MODERN SLAVERY - SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Introduction

- 1.1 As required by the Modern Slavery Act 2015 (the “Act”), this statement describes the steps which Slaughter and May has taken during the last financial year (1 May 2024 to 30 April 2025) to seek to ensure that modern slavery and human trafficking is not taking place in any of our supply chains, or in any part of our own business. In this statement references to “modern slavery and human trafficking” are as defined in sections 1, 2 and 3 of the Act.
- 1.2 We are committed to maintaining the highest standards in every aspect of our business. This includes our supply chain, where we consider the risk of modern slavery or human trafficking to be greatest. We work collaboratively with our suppliers to encourage them to take appropriate steps to prevent modern slavery and human trafficking.

2. Business, organisational structure and supply chains

- 2.1 Slaughter and May is a leading international law firm, providing a full and extensive range of legal services.
- 2.2 In London we practise through a general partnership which also has offices in Brussels and Beijing. In Hong Kong we practise through a separate partnership. For further information about our business model, including how we are regulated, see the [Legal and Regulatory Information](#) on our website.
- 2.3 Slaughter and May Services Company (“SMSC”) is the in-house company that we use to engage our staff in London and Brussels and arrange the secondment of individuals to/from the firm. As of 30 April 2025, SMSC employed 1569 legal and business services staff. SMSC has a separate [statement](#) and is wholly-owned by the partners of Slaughter and May.
- 2.4 Our supply chain is predominantly focused on running our premises and supporting the delivery of legal services. Our key suppliers include our catering, cleaning and security providers, the businesses that supply us with the technology we need to deliver our legal services to our clients and the recruitment agencies which provide us with both legal and business services staff (our “Key Suppliers”).
- 2.5 We also frequently work in partnership with other law firms to advise our clients on multi-jurisdictional matters. This approach is fundamental to our business model. Ordinarily our clients engage these other law firms directly, but from time to time we do so on their behalf on a sub-contracted basis.

3. Policies

- 3.1 [Responsible Business Report 2024](#) – We are signatories to the United Nations Global Compact. This commitment includes our support of the Ten Principles of the Compact, which covers human rights, labour, environment and anti-corruption. We publish an annual [Responsible Business Report](#) which outlines the progress we have made focusing on our six priority goals, where we can make the greatest contribution, against the UN Sustainable Development Goals. Our Responsible Business Report is reviewed and updated on an annual basis by our Responsible Business department, in coordination with other business services staff.

- 3.2 Supplier Code of Business Conduct – Our suppliers are expected to have fair employment practices which comply with the law and not to engage in any practices that are known to contribute to the risk of modern slavery and human trafficking. The Supplier Code of Business Conduct requires that suppliers ensure their sub-contractors comply with the standards described in this Code. The vast majority of our suppliers have agreed to comply with this Code and we generally embed obligations to comply with this Code in our supplier contracts. Alternatively, we seek assurances from suppliers that their own Code of Conduct contains equivalent standards. This forms part of our supplier selection criteria.
- 3.3 Code of Business Conduct – Our commitment to fair employment practices in relation to our own employees is embodied in our Code of Business Conduct. Our Code is underpinned by our values - the highest standards, independence of thought, collective endeavour and respect for all. All of these are covered in inductions for new staff, reinforced through regular training for existing staff and reflected in our policies and procedures. They include rejecting bribery and corruption, not facilitating criminal conduct by another person, playing a role in combating financial crime, respecting all employment rights and protections, including those aimed at eliminating slavery, servitude and forced, compulsory child labour, and treating others fairly and with dignity and respect.
- 3.4 Supplier Due Diligence policy – We have an internal Supplier due diligence policy which sets out the checks Contract Owners should run for new and existing suppliers of the firm, details of which are set out below. This guide is available to our partners and staff on the firm's intranet and reviewed on an annual basis by our Procurement department.
- 3.5 Whistleblowing (raising concerns) policy – Our internal whistleblowing policy requires staff to raise any concerns relating to possible criminal offences, breaches of the law, a serious breach of firm policy or procedure and any aspect of our operations or premises which may endanger someone's health or safety, or any other concern. If staff wish to raise concerns, they may do so in confidence (unless we are required to comply with a competing legal or regulatory obligation). We will not tolerate victimisation of anyone who raises a concern of suspected wrongdoing. This policy is reviewed on an annual basis by our HR department.

4. Risk assessment and due diligence processes for suppliers

- 4.1 The firm is a regulated legal service provider operating within a strict ethical and regulatory framework. Accordingly, we consider the risk of modern slavery or human trafficking occurring within our business to be low. We recognise that there is a greater risk of modern slavery or human trafficking occurring within our supply chain. For this reason, this statement focuses on our due diligence processes in relation to our supply chain. We have a separate statement for SMSC, the in-house company we use to engage our staff and arrange the secondment of individuals to/from the firm, which describes our recruitment due diligence processes.
- 4.2 We generally regard our labour-intensive on-site business services suppliers, which include our Key Suppliers, as being at higher risk of modern slavery and human trafficking.
- 4.3 Our internal Supplier due diligence policy requires Contract Owners to consider the potential risks associated with engaging new suppliers at the outset of each procurement project, and for existing suppliers when a contract is due for renewal, if the controller of the supplier changes or on a regular basis for longer-term contracts.
- 4.4 This includes identifying whether there is an increased risk of modern slavery or human trafficking, for example due to the nature of the goods or services being procured or the jurisdiction involved. Contract Owners cooperate with the Procurement department as necessary in carrying out their risk analysis and in determining whether further due diligence is needed.
- 4.5 Contract Owners are required to conduct adverse media checks at the outset of all procurement projects. The Procurement department also conducts regular adverse media checks for our catering, cleaning, security and engineering providers, as well as our on-site design agency.
- 4.6 Our Key Suppliers, and other suppliers identified as being higher risk by the approach described above, must complete a Responsible Business Supplier Due Diligence Questionnaire to demonstrate they meet the necessary standards we expect in

respect of human rights and fair working practices. This includes, but is not limited to, asking whether the supplier publishes an annual modern slavery statement, adopts practices known to contribute to the risk of modern slavery and human trafficking (for example, holding identification documents belonging to workers or preventing workers from leaving the workplace during non-working hours) and provides training or education to staff on modern slavery and human trafficking. We encourage Contract Owners to include a contractual audit right to monitor the performance and working practices of a supplier where the due diligence conducted during the selection process has identified a potential risk area, including in relation to modern slavery.

- 4.7 We are an accredited Living Wage Employer by the Living Wage Foundation and we require our on-site catering, cleaning, engineering and security suppliers in the London office to pay their personnel a salary which is equivalent (at least) to the London Living Wage. The London Living Wage reflects the high cost of living in the capital and is higher than UK employers are required to pay by law.
- 4.8 We have launched a new legal supplier questionnaire for law firms we work with frequently, which requires these firms to confirm they have policies and procedures in place to prevent modern slavery and human trafficking in their own operations and supply chain, and that they comply with the spirit of our Code of Business Conduct. We have sent the questionnaire to a large majority of the firms we work with who operate in Europe, the US, APAC, and the growth markets. Their responses will be collated and updated on a periodic basis. If our due diligence causes us to suspect that modern slavery or human trafficking may have occurred in our supply chain, we would investigate this. If instances of modern slavery or human trafficking are confirmed, we would engage in remediation discussions or terminate our arrangements with that supplier.
- 4.9 Following a review of our central Procurement function in 2024, we created a new Head of Procurement role. The Head of Procurement is currently leading a programme of development which will include greater alignment of procurement policies across our offices, and introducing a renewed due diligence process which will establish a gate system that mandates that all suppliers must pass through a supplier approval process to become 'approved suppliers' to the firm.

5. Additional risk management practices

- 5.1 Contract Owners are required to meet formally with Key Suppliers on a regular basis and, among other things, address their approach to modern slavery and human trafficking at those review meetings. Where there are areas for improvement in a supplier's approach to modern slavery and human trafficking, based on their responses to the Responsible Business Questionnaire, Contract Owners are encouraged to monitor their progress and work with them to strengthen their approach.
- 5.2 The Responsible Business Committee is responsible for overseeing the development and implementation of our ESG strategy, including consolidation across our operations. The Committee reports annually to the Partnership Board on progress against the ESG objectives. Its membership includes our Managing Partner, Chief Operating Officer, Director of Sustainable Business and partner representatives. Following the disbanding of the SDG Working Group, the Responsible Business Committee oversees progress in respect of the firm's controls to prevent modern slavery and human trafficking from occurring within our supply chain.

6. Supplier engagement

We recognise that combatting modern slavery requires us to work collaboratively with our suppliers. We are committed to working with our suppliers to enhance our knowledge of their practices so that we can actively work with them towards building ethical and sustainable supply chains. We do this by encouraging open dialogue with our suppliers, sharing best practices, and educating ourselves on this issue.

7. Effectiveness and performance indicators

We identified no instances of modern slavery or human trafficking within our business or supply chain during the last financial year.

8. Training

- 8.1 We are looking at running an event in 2026 for our key suppliers around modern slavery.
- 8.2 We will also be delivering training around modern slavery risks across the firm, including to all new all joiners.

Signed by:

David Johnson, Managing Partner

9 October 2025

London
T +44 (0)20 7600 1200
F +44 (0)20 7090 5000

Brussels
T +32 (0)2 737 94 00
F +32 (0)2 737 94 01

Hong Kong
T +852 2521 0551
F +852 2845 2125

Beijing
T +86 10 5965 0600
F +86 10 5965 0650

Published to provide general information and not as legal advice. © Slaughter and May, 2025.
For further information, please speak to your usual Slaughter and May contact.

www.slaughterandmay.com