

Modern Slavery Statement 2025

Statement pursuant to S.54 of the Modern Slavery Act 2015 (UK) and S.14 of the Modern Slavery Act 2018 (Cth) (Aust)

This statement is made and published jointly on behalf of (1) Ashurst LLP, a limited liability partnership registered in England and Wales (2) Ashurst LLP's wholly-owned subsidiary, Ashurst Business Services Limited, (3) Ashurst Australia, a general partnership constituted under the laws of the Australian Capital Territory, and (4) Ashurst Australia Services Pty Limited in its capacity as trustee for the Travinto Services Trust, having its registered office in Victoria. References to "Ashurst", "we", "us", "our", or the "firm" are to these bodies, together with the related entities that carry on the Ashurst business around the world.

Ashurst structure

Ashurst is a global law firm advising the world's largest companies, financial institutions and governments. The "Ashurst Group" comprises Ashurst LLP, Ashurst Australia and their respective affiliates which are authorised to use the name "Ashurst" or describe themselves as being in association with Ashurst.

Ashurst LLP is a limited liability partnership registered in England and Wales under number OC330252. It is a law firm authorised and regulated by the Solicitors Regulation Authority ("SRA") of England and Wales under number 468653 with the registered office being London Fruit & Wool Exchange, 1 Duval Square, London, E1 6PW, England.

Ashurst Australia (ABN 75 304 286 095) is a general partnership constituted under the laws of the Australian Capital Territory.

Ashurst operations

We operate from 31 offices, across 18 countries and we employ over 4,000 people. We provide clients with commercial legal advice across a broad range of industry sectors, including Banks and Private Capital, Digital Economy, Projects & Energy Transition, Infrastructure, and Real Estate transactions.

We also offer a range of adjacent professional services (including Board Advisory, Risk Advisory and limited Trust and Company Services provision) in some jurisdictions.

We operate predominantly in countries that have been assessed by the Global Slavery Index as having both a lower prevalence of modern slavery and active government responses to dealing with such issues.

We wholeheartedly support the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Cth) (Aust).

Ashurst People and Training

Our people are our greatest asset. We foster an environment that is welcoming, inclusive and respectful of all backgrounds and perspectives.

We pay our employees at least the minimum wage in their local jurisdiction. We pay the UK Living Wage in Glasgow and the London Living Wage in London.

We provide a dedicated employee assistance programme that is a life management and personal support telephone service, available to our employees 24 hours a day. This confidential service supports our people's mental, physical, social and financial wellbeing.

We require all Ashurst personnel to complete an e-learning course on modern slavery and workplace behaviours annually.

We regularly review our global recruitment procedures and providers, as well as our arrangements for our people's and contractors' welfare, championing mental and physical wellbeing.

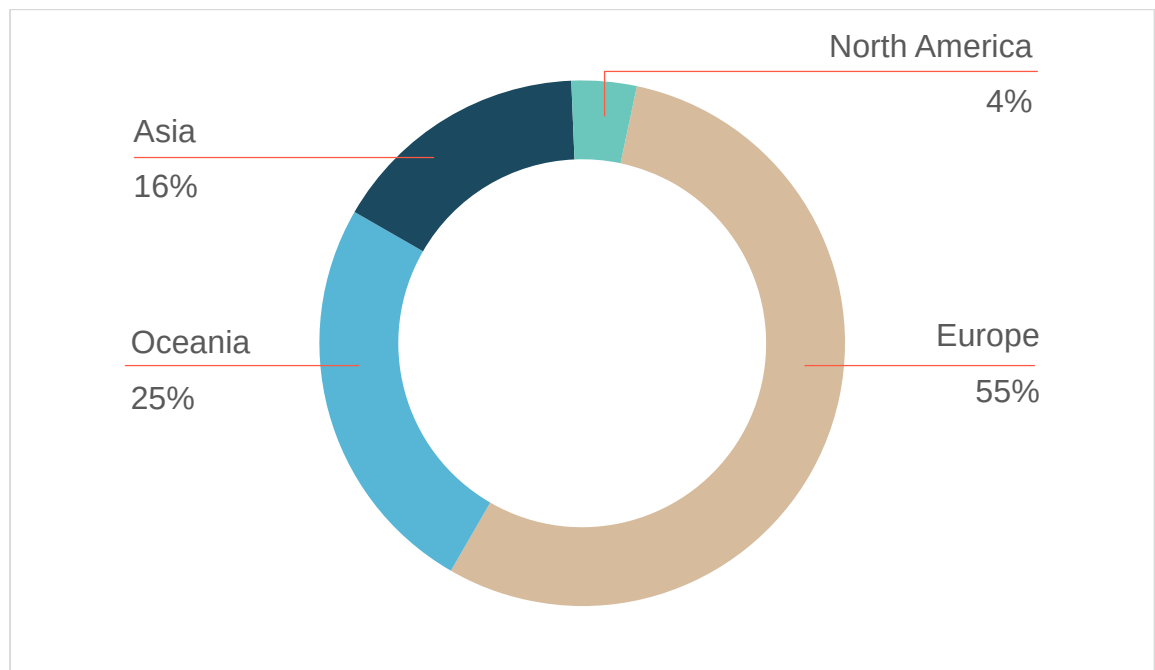
Ashurst supply chain

We have a centralised Procurement Team based in Australia and the UK who are responsible for the procurement of goods and services and supplier contract management across the group.

Our supply chain consists primarily of low-risk professional support services or office facilities, which support our partners, lawyers and people in their work. The key components they supply us with are:

- **Real estate:** our offices that we work from.
- **Technology:** including IT hardware and software and print services that support our business.
- **Business services:** the products we buy; for example, furniture, stationery and marketing items, as well as the services we use, such as catering, security and cleaning.
- **Travel services:** organising and booking travel and accommodation requirements.
- **Professional services:** including external training services, consultants, contractors and legal support services.

The chart below shows the percentages of our suppliers by location for financial year 2024-25. It shows that the majority of our suppliers are located in regions where Ashurst has an office.



Assessing the risks in our supply chains

Ashurst does not tolerate slavery or human trafficking or abusive treatment in any of our supply chains.

The firm is responsible for compliance with regulatory obligations where our work is carried out through others.

Ashurst operates an Enterprise Risk Management (ERM) approach, coordinated by the ERM Team, who work with subject matter experts and risk owners throughout the firm to ensure that risks are identified, recorded and responded to.

The Procurement Team are the risk owners for supply chain risk management. They are supported by subject matter experts within Ashurst's centralised Risk and Compliance Department, based in Australia and the UK. They work together to identify risks and ensure that our regulatory obligations and the firm's high standards are met, and our risks are appropriately managed.

We carry out thorough due diligence and ongoing monitoring on all major global suppliers in line with legal and regulatory requirements across our business. We use a third party risk assessment platform on which due diligence questionnaires, answers and supporting documentation can be exchanged between the supplier and Ashurst. This platform allows us to identify and score risk areas, including modern slavery and human trafficking. This enables us to monitor any remediation action by a supplier.

We operate in the legal sector, which is generally assessed as low risk for instances of modern slavery.

Ashurst policies and procedures

Our policies make clear our approach to modern slavery and all forms of discriminatory or exploitative behaviour and treatment. Our key policies and procedures are set out below. They outline how we mitigate the risks of modern slavery and are reviewed on a regular basis:

Code of Conduct: sets out the conduct that we expect of our people, contractors and suppliers. It also sets out that we conduct our business in accordance with international human rights principles. Our code of conduct states that we will not tolerate slavery or human trafficking or abusive or unfair treatment in any part of our own business, or in any of our supply chains.

Global Procurement Policy and Guidelines: establishes a global framework to ensure the firm is procuring goods and services in an ethical and sustainable way. The Policy sets out the firm's expectation that appropriate due diligence is carried out on an ongoing basis to ensure that slavery and human trafficking are not taking place in any of the firm's supply chains.

Third Party Risk Management Manual: sets out how all third parties to the firm are incepted through a global process of selection and thorough risk assessment to ensure the appropriate level of pre-engagement due diligence is performed on a risk-based approach, and documented. The management of third parties supplying the firm follows monitoring principles: an annual

review and evaluation; rights to audit, when required by our risk-based approach; and a report made to the firm's Risk Committee for oversight.

Global Counter Financial Crime Policy: covers our global obligations to ensure that we are not entering into or becoming concerned with an arrangement that facilitates the acquisition, retention, use or control of the proceeds of crime derived from criminal activity, such as modern slavery.

Global Social Impact Policy: sets out our commitment to working to make a positive social impact and supporting the communities in which we operate. It informs our Global Social Impact Programme, which works to increase access to opportunities for communities and individuals experiencing marginalisation and disadvantage, financial exclusion and/or hardship. One of our Global Social Impact Programme focus areas is to work towards eradicating all forms of modern slavery through a committed Modern Slavery Action Plan and partnership with leading community organisations.

Global Equal Opportunities Policy: sets out our commitment to being an equal opportunities employer and to providing an inclusive working environment where everyone is treated with respect and dignity. The policy applies to current, potential or future personnel, consultants, contractors, agency workers and interns. All of our people are required to comply with this policy, which also applies in all of the firm's professional dealings with third parties.

Global Domestic and Family Violence Policy: sets out the firm's commitment in supporting our people who may be impacted or affected by domestic and family violence. The policy also sets out what support is available to any of our people who are experiencing, impacted by or escaping domestic and family violence.

Global Parental Leave Policy: provides a globally consistent framework for parental leave entitlements across all of our offices. The policy sets out the financial and emotional support that we provide to our people to support their economic resilience during parental leave.

Global Harassment and Bullying Policy: ensures that everyone at Ashurst is treated with respect and dignity and that no one is exposed to harassment, bullying, discrimination or victimisation in any aspect of their work. The policy sets out the firm's zero-tolerance approach to any inappropriate behaviour, whether by or against employees or by any work-related third party, and the steps to take to report and resolve any concerns. The policy also provides support and protection for those who raise, or participate in, complaints and aims to foster an inclusive, diverse and belonging culture at Ashurst.

Global Whistleblowing Protection Policy and Procedure: encourages everyone at Ashurst to disclose any illegal or unethical conduct that may be related to the firm or conduct that places the firm at risk. The policy is designed to ensure that individuals have a way of raising these concerns safely and in the knowledge that they will be treated seriously.

Our actions in the past 12 months and looking ahead

Over the past 12 months, the following actions have been undertaken:

- **Enhanced training and signposting of our new intake process for spend requests resulting in increased visibility of spend on goods that may be at increased risk of modern slavery:** Training has been provided to administrative staff and budget holders across the firm that explains the process for ensuring that the Procurement Team have advance visibility of all relevant spend and final approval of all purchase orders. The Procurement Team are confident that we have the opportunity to review any spend that may be at a heightened risk of modern slavery and to take any appropriate actions. In conjunction with our Social Impact Teams, we liaised with an Australian NGO to provide anti-slavery training building on existing e-learning. The workshop focused on awareness and processes to create more-diverse supply chains, with the aim of minimising our exposure to modern slavery.

Actions ongoing with delivery expected in the next 12 months:

- **Implementation of a new, end-to-end supplier intake, risk-management and contract-management system:** We anticipate that this new system will allow more-detailed modern slavery due diligence targeting of suppliers at increased vulnerability to modern slavery. A new P2P finance system will be added to this, which will further enhance control and visibility over all spend, allowing more accurate reporting on spend at increased risk of modern slavery. This reporting will, in turn, create opportunity for a more strategic approach to modern slavery risk management of all value across the firm. The new system is planned to be implemented in Q4 2025.
- **Interactive Spend Guidance Tool:** This new guidance tool has been created which, in a response to a request for spend on goods at increased modern slavery risk, will generate tailored advice to the requisitioner on sustainable sourcing, along with a pre-approved supplier list.
- **Implementation of SpeakUp@Ashurst:** This new reporting platform can be used to make reports, including anonymous reports, of inappropriate behaviours that individuals may have experienced firsthand or witnessed as a bystander. All Ashurst workplace participants can make reports, including: partners, employees, former employees, temporary or contract staff, consultants, secondees or consultants, board members, volunteers, visitors and suppliers.

How we assess the effectiveness of our actions

In assessing the effectiveness of our actions, we undertake the following steps.

Assessing the effectiveness of our training: We assess completion rates of our compulsory modern slavery e-learning course and follow up with individuals, where necessary, to ensure compliance. During that past 12 months, 85% of our people globally have completed the training.

Internal review of our policies and procedures: We regularly review our policies and procedures to ensure they are in line with regulatory requirements and best practice. This also

includes reviewing our due diligence and ongoing monitoring procedures in relation to our suppliers.

Key Risk Indicators: We measure supply chain management key risk indicators quarterly (and report on these to our Enterprise Risk Team). Some of these metrics allow us to monitor and maintain compliance with our Supplier Risk Management Programme and its effectiveness in meeting its key objectives.

External scrutiny Our modern slavery policies and procedures also come under external scrutiny and are assessed by our clients through pitch processes, and periodically through audit assessments that set out to understand and verify our posture around modern slavery.

External engagement

Ashurst's founder, William Henry Ashurst, was a progressive advocate who was deeply committed to social justice, particularly the abolition of slavery.

In recognition of the continued growth of modern slavery, we have expanded our existing pro bono work in this area into a global focus for the firm. This enables us to acknowledge our founder's legacy and commit to promoting and continuing that legacy on an issue that remains a massive threat today.

Through partnership with a range of charities, we provide pro bono support to not-for-profit organisations (NFPs) working to address and eradicate all forms of modern slavery. In some jurisdictions, we also provide pro bono legal advice to victims/survivors of modern slavery and human trafficking.

Our Social Impact Teams run initiatives with NFPs in the modern slavery sector, including running workshops to raise awareness and to provide mentoring support for victims of modern slavery and human trafficking. This support assists with English language, employment and IT training skills to help survivors build confidence and work towards independence.

Communication

We publish copies of our Modern Slavery Statements on our global website and on the Australian and UK Modern Slavery Statement Registers.

Consultation and board approval

This statement was prepared by Central Business Services Teams representing all of the entities noted below.

This statement was:

Approved by the boards of the relevant entities:

- **Ashurst LLP** on 1st August 2025

- **Ashurst Australia** on 1st August 2025
- **Ashurst Business Services** on 1st August 2025
- **Ashurst Australia Services, in its own capacity and as trustee for the Travinto Services Trust** on 1st August 2025

Approved by the members of Ashurst LLP on 15th August 2025

Signed by the Global Chair and Global CEO of Ashurst, being designated and responsible members and directors of each respective entity on their behalf.

Signed:  Karen Davies Global Chair	Signed:  Paul Jenkins Global CEO
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