



Modern Slavery and Human Trafficking Statement 2021/22

12 October 2022

Purpose of this statement

This statement is made on behalf of Allen & Overy LLP, its wholly owned subsidiary Allen & Overy Service Company Limited, Allen & Overy, a partnership, and the entities that they own or control (including The Trustee for Allen & Overy (Australia) Discretionary Trust and its trustee Allen & Overy (Australia) Pty Ltd) (together, the **Firm**) pursuant to section 54(1) of the Modern Slavery Act 2015 (the **UK Act**) and section 14 of the Modern Slavery Act 2018 (Cth) (the **Australian Act**) (the **Statement**). The Statement describes the steps the Firm has taken in the financial year ending 30 April 2022.

Introduction

The Firm takes its obligations in relation to the identification, reporting and prevention of modern slavery and human trafficking very seriously. The Firm is committed to taking appropriate steps to ensure that modern slavery and human trafficking does not occur within any part of its own business or any of its supply chains. The Firm's Business and Human Rights practice is also working with clients to help them avoid involvement in modern slavery and human trafficking and also has a programme of charitable and pro bono work that supports many human rights charities and non-government organisations.

Overview of business activities

The Firm is one of the world's leading international legal practices providing legal expertise and legal services across a number of sectors within a culture built on a philosophy of continual improvement to meet its clients' changing needs. The Firm's expanding network of more than 40 offices in 27 countries spans Europe, Asia Pacific, the

Middle East, North America, Central and South America and Africa. The Firm's full-service capabilities are delivered by approximately 6,200 people, including some 580 partners worldwide who work in a highly integrated manner across the Firm's office network.

The Firm's supply chain

As a law firm, the Firm has a relatively simple supply chain model that is built around supporting its core legal practice and maintaining its global office and technology infrastructure. The types of goods and services necessary to do so fall into five broad categories:

- i) business services – the diverse range of products and services the Firm buys to ensure it can maintain normal day-to-day operations in its offices and support its core legal practice, such as catering, security, library services, and print and document services;
- ii) professional services – the professional services the Firm buys, such as external training, audit

services and advisory services in areas such as tax, regulation, and insurance;

- iii) real estate – the office space the Firm buys or leases to accommodate its people and operate its business;
- iv) technology – the systems, software, and equipment that are necessary to maintain its global technology infrastructure that supports the Firm’s legal practice; and
- v) travel – as an international law firm, global mobility is essential and the Firm works with a large number of travel providers such as hotels and airlines.

The Firm considers that the provision of these services and facilities generally present a low risk of modern slavery and human trafficking. However, the Firm has a central procurement function that manages the procurement of high value and/or goods and services that are considered to present a medium or high risk in accordance with the Firm’s procurement policy and formal tendering procedures. More information about how the Firm procures goods and services, and screens new suppliers is contained in the section below titled *Risk assessment of the Firm’s supply chain and due diligence procedures and actions taken to address those risks*.

Relevant policies

The Firm has a number of existing policies and procedures which are relevant for mitigating the risk of slavery or human trafficking occurring in the Firm’s business or any of its supply chains. In particular, the following Firm policies are directly relevant to the issues discussed in this Statement:

- **Procurement policy** – this policy includes specific procedures relating to how slavery and human trafficking risks are identified and assessed through the Firm’s procurement processes.
- **Supplier code of conduct** – the code of conduct sets out the standards the Firm expects its suppliers to observe, including provisions that specifically prevent the use of compulsory and involuntary labour. The code of conduct also provides the Firm’s suppliers and their workers

with a mechanism to report suspected breaches of the code or other abuses to the Firm for investigation.

- **Third party suppliers’ background checks policy** – this policy sets out the screening and background checks that suppliers to the Firm must adhere to in relation to their employees (including identity verification and right to work verification).
- **Authority limits and contract signing policy** – this policy sets out the Firm’s internal control and governance procedures with regard to approving financial transactions and signing contracts with suppliers. The policy ensures that contracts cannot be entered into without an appropriate level of review and authorisation by a suitably senior and qualified member of staff.
- **Health and safety policy** – this policy sets out the Firm’s commitment and approach to ensuring it provides a healthy working environment for its own staff and contractors that work onsite.
- **Dignity at work policy** – this policy sets out the Firm’s approach to preventing the occurrence of discrimination, harassment, bullying or victimisation in the work place.
- **Complying with the law** – this policy makes it clear that we must all comply diligently with laws and regulations governing business conduct in general and the legal profession in particular.
- **Speaking up** – this policy encourages everyone at Allen & Overy to do the right thing within a culture of integrity and honesty. That includes giving colleagues the freedom to call out any potential wrongdoing, misconduct or inappropriate behaviour, danger or mistake at work that they are concerned about, assured that their worries will be listened to and acted upon. We will not tolerate reprisals, victimisation or threats against anyone who has spoken up in good faith.

The Firm also provides its employees with access to an employee assistance programme (provided by an independent third party company) that can be used by its employees for free and confidential advice in relation to workplace concerns or issues.

Policies that are directly relevant to our supply chain (such as our supplier code of conduct and third party background checks policy) are shared with our suppliers through a policy portal website that can be accessed at any time by our suppliers.

Risk assessment of the Firm's supply chain and due diligence procedures and actions taken to address those risks

As a regulated international legal practice, the risk of modern slavery and human trafficking existing within the Firm's own business is considered to be low.

The Firm recognises that the greatest risk of modern slavery and human trafficking is in its supply chains. As a result, the Firm's procurement policy requires that all new suppliers are subject to an appropriate level of risk assessment and screening. The scope of the risk assessment and screening the Firm performs depends on the nature of the goods or services being procured, but can include:

- financial checks;
- data security assessments;
- reference checks;
- obtaining copies of relevant documents;
- corporate responsibility checks;
- site inspections/audits; and/or
- modern slavery risk assessments.

To determine whether a modern slavery risk assessment is required, the Firm employs an analytical method that takes into account various risk factors (including country, sector and impact risk) to give an overall indication of potential risk with a given supplier. Prospective suppliers are then allocated a risk score which determines the extent of further due diligence required. Higher risk suppliers are required to complete a modern slavery questionnaire which is used by the Firm to evaluate the adequacy of a supplier's current anti-modern slavery policies and controls. Where appropriate, the assessment may also include a site audit and

development of an action plan to address any identified gaps.

Suppliers are also contractually required to adhere to the Firm's supplier code of conduct (which explicitly forbids the use of forced labour and other forms of human rights abuses) and other policies, as applicable to the supplier, published in our supplier policy portal site. In addition to this, the Firm includes specific anti-slavery and human trafficking contractual clauses in contracts for goods and services that are categorised as of higher risk.

Since June 2020, in light of the COVID-19 pandemic, the Firm has applied enhanced due diligence processes to pose additional questions to suppliers regarding workplace conditions and homeworking. The Firm has also applied a media monitoring system to track media coverage of its key suppliers (approximately 50 suppliers).

If any instances of modern slavery or human trafficking are suspected in the Firm's business or supply chains, the Firm will investigate and, if substantiated, engage in remediation processes as appropriate, which may include terminating its relationship with the relevant supplier.

Evaluating the effectiveness of the Firm's actions

The Firm monitors and reviews the following indicators of relevance to its effectiveness at preventing slavery and human trafficking in the Firm's business and supply chains:

- the number of modern slavery risk assessments carried out in relation to medium to high risk suppliers;
- supplier audit results;
- formal scorecard reporting on the performance of its key suppliers, including compliance and risk matters; and
- the number of staff provided with modern slavery training, including those completing our modern slavery e-learning module.

Training in relation to modern slavery and human trafficking

The Firm has introduced a modern slavery e-learning module that seeks to:

- raise awareness about modern slavery and the various forms it can take;
- teach staff and partners to recognise the red flags that may indicate modern slavery;
- understand what to do if a case of modern slavery or human trafficking is suspected within the supply chain; and
- learn about the laws associated with modern slavery and the Firm's policies in relation to preventing the occurrence of Modern Slavery within the supply chain.

The modern slavery e-learning module has been rolled out globally across the Firm and completing the course is mandatory for all of our staff and partners. A new version of the training was launched in February 2022 to include Australia's Modern Slavery Act, the California Transparency in Supply Chains Act, and associated guidance from the UN and various governments.

The Firm also delivers more targeted training for the teams and individuals within the business that have direct responsibility for procuring goods and services and managing suppliers. The training is focused on raising awareness of the Firm's specific procedures for identifying and appropriately screening higher risk suppliers.



Wim Dejonghe

Designated Member, on behalf of Allen & Overy LLP
12 October 2022

Consultation and approvals

The Statement was prepared by the Firm's central Risk team (with input from other teams) in consultation with, and reviewed and approved by, each of the individual entities comprising the Firm.

The Statement was approved by the Board of Allen & Overy LLP on behalf of the Firm on 12 October 2022.



Wim Dejonghe

Director, on behalf of Allen & Overy Service Company Ltd
12 October 2022