

# Modern Slavery Statement

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, registered under the laws of the Australian Capital Territory. References to "Ashurst", "we", "us", "our" or the "firm" are to these bodies, together with the related entities that carry on the Ashurst business across the world.

## Overview

Ashurst is a leading global law firm advising the world's largest companies, financial institutions and governments. Ashurst also offers a range of adjacent professional services (including board advisory, risk advisory and limited trust and company service provision) in some jurisdictions. We operate from 30 offices, across 20 countries, advising across a broad range of industry sectors including Banks and Private Capital, Digital Economy, Energy and Resources, Infrastructure and Real Estate transactions. With a focus on quality, collaboration and a progressive culture we aim to deliver a distinctive service to our clients that sets us apart from other law firms.

We wholeheartedly support the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Cth) (Aust) whose provisions assist to eradicate modern slavery, wherever it may occur, and raise public awareness of the problem. In addition to working to prevent modern slavery in our own supply chains, Ashurst's Social Impact Team is also working with a range of partners to support a wide range of initiatives to eradicate all forms of modern slavery around the world.

## Our approach

We are committed to achieving the highest standards of ethical behaviour in the conduct of our business and activities worldwide. We support and respect the protection of internationally proclaimed human rights and endeavour to make sure that Ashurst is not complicit in human rights abuses. To this end, 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. We are generally, and in particular through our policies and practices in relation to procurement, people and culture and corporate responsibility, committed to taking steps to ensure that slavery and human trafficking play no part in our own business or in our supply chains.

Our Modern Slavery Action plan, initiated by Ashurst's Pro Bono and Social Impact teams in 2020, continues to draw engagement from our lawyers in legal work supporting the fight against modern slavery. Details of our Modern Slavery Action Plan can be found [here](#).

## Our operations and supply chain

The legal sector, in which we operate, is generally assessed as being at low risk for instances of modern slavery. We operate predominantly in countries which have been assessed by the Global Slavery Index as having both a lower prevalence of modern slavery and active government responses to dealing with the issues. Our supply chains consist primarily of the provision of low risk professional support services or office facilities, which support our partners, lawyers and staff in their work. The key components they supply us with are:

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

## Policies and Procedures

We have a zero tolerance approach to modern slavery and all forms of discriminatory or exploitative behaviour and treatment, whether within our own business or that of those who supply us; this stance is made clear in all our policies and behaviours. Our key policies and procedures, which outline the steps that we have taken to mitigate against the risks of modern slavery, are set out below. These are reviewed on a regular basis.

- Our Code of Conduct which sets out the conduct that we expect of our partners, employees, contractors and suppliers, expressly states that we will not tolerate slavery or human trafficking.
- Our Global Procurement Policy and Guidelines establishes a framework for assessing the social, environmental and ethical impacts of goods and services procured by Ashurst.
- Our Global Contracts Protocol and the Third Party Risk Management Manual requires due diligence on new vendors and ongoing monitoring and management of existing vendors to Ashurst.
- Our Global Anti-Money Laundering and Counter Terrorism Financing Policy which covers our compliance obligations with respect to suspected proceeds of crime including those derived from criminal activity such as modern slavery.
- Our Global Social Impact Responsibility Policy which sets out our approach to supporting anti-slavery and human trafficking initiatives.
- Our Global Equal Opportunities Policy outlines our commitment to being an equal opportunity employer and providing an inclusive working environment. All partners and staff are expected to act with integrity and honesty in a manner which not only is, but encourages, fairness, inclusivity and transparency.
- Our Global Domestic Violence Policy which sets out the firm's commitment in supporting employees who may be impacted or affected by domestic and family violence.
- Our Global Whistleblowing Protection Policy which allows staff to raise any concerns that they may have about any individuals or organisations that Ashurst interacts with, whether they be clients, suppliers or others.

## Procurement and supplier due diligence

Recognising that the greatest risk of modern slavery is in our supply chains, we continue to take steps to ensure that those are routinely reviewed and proactively managed. Key updates during the last twelve months include:

- expanding our Australian Procurement team to support enhanced due diligence on our local supply chain in that region ;
- in Quarter 1 of 2022, we undertook an audit of 10 % of our critical suppliers . No issues were identified and no remedial actions were needed;
- continued enhancement to our contract management system across all Ashurst third party contracts to ensure consistent application of terms in relation to modern slavery, and
- standardising our global approach to the purchase of any Ashurst branded marketing materials. All suppliers of such products will be pre-qualified with all checks including modern slavery checks completed in advance.

## Training of Staff

Our e-learning courses on modern slavery and workplace behaviours are mandatory training modules for all Ashurst personnel and are required to be completed annually.

Over the last financial year members of Ashurst's legal teams have undertaken 1,452 hours of pro bono work on modern slavery and human trafficking matters upskilling themselves on issues, as well as assisting the community. A further 207 hours of specialist skilled volunteering was provided through a secondment and Employability / IT literacy workshops with survivors of exploitation.

In the last twelve months our internal Modern Slavery Portal has received over 300 hits from our staff members who want to learn more and be involved with modern slavery campaigns and initiatives which are led by our pro bono and social impact teams.

## Recruitment and welfare of our people

We are a leading law firm with almost 4,000 employees, partners and contractors working across Asia, Australia, Europe, the Middle East and North America. As a professional services firm, people are our most valuable asset at all levels of the business.

As part of our People and Culture policies and procedures we only use reputable recruitment firms and comply with all relevant local laws and regulations. We regularly review our global recruitment procedures and providers, as well as our arrangements for employee and contractors welfare by championing mental and physical wellbeing. All employees are paid at least the minimum wage in the local jurisdiction and in London employees and contractors are paid the London Living Wage or above.

The firm has a dedicated employee assistance programme which is a life management and personal support telephone service and is available to our employees 24 hours a day. This is a confidential service which is designed to support mental, physical, social and financial wellbeing.

In 2021 we updated our Parental Leave Policy which introduced progressive changes and a globally consistent framework for parental leave entitlements across all our offices. The policy sets out financial and emotional support which provides our members of staff with the economic resilience they need during parental leave.

## Communication

Copies of our Modern Slavery Statements are published on our global website and on the Australian and UK Modern Slavery Statement Registers.

## Consultation and Approval

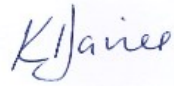
This statement was prepared by central business services teams representing all of the above entities.

This statement was:

- Approved by the boards of the relevant entities
- Ashurst LLP on 25th July 2022
- Ashurst Australia on 25th July 2022
- Ashurst Business Services on 25th July 2022
- Ashurst Australia Services, in its own capacity and as trustee for the Travinto Services Trust on 25th July 2022

Approved by the members of Ashurst LLP on 9th August 2022

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

Handwritten signature in cursive script, appearing to read "K. Jaeger".Handwritten signature in cursive script, appearing to be a monogram or initials.