

# 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, and (2) Ashurst LLP's wholly-owned subsidiary, Ashurst Business Services Limited, and (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. As well as offering in some jurisdictions a range of adjacent professional services (including board advisory, risk advisory and limited trust and company service provision). We operate from 29 offices, in 11 time zones and across 18 countries, advising over 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 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, human resources 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.

In October 2020, to coincide with Anti-Slavery Day, Ashurst's Social Impact and pro bono teams initiated our Modern Slavery Action Plan. Details of our Modern Slavery Action Plan can be found [here](#).

## Our operations and supply chain

The sector within which we operate is generally assessed as being at low risk of modern slavery being present within it, and we operate predominantly in countries which have been assessed, by the Global Slavery Index, as having a lower prevalence of modern slavery, together with 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. Its key components supply us with:

- 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 in 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 towards modern slavery and all forms of discriminatory or exploitative behaviour and treatment, whether within either our own business or that of those who supply us; this stance is made very clear in all our policies and behaviours. The most relevant of the policies and procedures that we have in place, and the steps that we have taken to mitigate against any risks of modern slavery, are set out below

- Our Code of Conduct which sets out the conduct that we expect of our firm, employees, contractors and suppliers, and explicitly states that we will not tolerate slavery or human trafficking.
- Our Global Social Impact Responsibility Policy which, among other things, sets out our policy and approach on anti-slavery and human trafficking.
- Our Global Procurement Policy and Guidelines which aims to ensure that all goods and services acquired on behalf of the firm are acquired in line with procurement best practice, on the most advantageous commercial terms, at the lowest risk profile and with proper consideration of the social, environmental and ethical impacts of such activity.
- Our Global Contracts Protocol which aims to manage the firm's contractual risks by ensuring that appropriate due diligence is undertaken before entering into contracts. Due diligence requirements include a specific requirement to carry out due diligence in relation to slavery and enforced labour with all potential new vendors to Ashurst.  
Our Global Anti-Money Laundering and Counter Terrorism Financing Policy which aims to ensure that we are complying with our AML/CTF obligations and that we are not facilitating the proceeds of crime which has derived from criminal activity such as modern slavery.
- Our Global Anti-Bribery and Corruption Policy which aims to ensure that we are not engaging in bribery and corruption and applies to all our partners, staff and business partners.
- 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 Whistleblowing Protection Policy that 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 both regulated and reviewed.

- We continue to refresh our risk assessment for suppliers, both for direct and indirect suppliers through our extended supply chain. We continue to develop our systems and controls for supplier engagement, which is co-ordinated globally through our procurement team based in the UK. As part of this process the procurement team monitor firm expenditure to ensure it is tracked through the centralised procurement system.
- Our supplier contract terms include undertakings that suppliers comply with all applicable laws, regulations, and codes of conduct and in an ethically compliant manner including with our standard business practices terms. These terms cover, amongst other things, labour and workplace management and touch on matters such as child, forced and involuntary labour; fair pay and working conditions; and training, learning and development opportunities.
- New suppliers. Ashurst's Global Procurement Policy mandates that a thorough due diligence process is carried out on key new suppliers. Accordingly, our standard bid invitation documentation asks key suppliers to demonstrate the steps they take to avoid or eliminate slavery and human trafficking from their supply chain. The disclosure of any slavery or human trafficking issue would mean a prospective supplier would be immediately disqualified from the procurement process. This has not happened as yet.
- Existing suppliers. Ashurst participates in a supplier information portal, which facilitates timely exchange of up-to-date information on aspects of certain supplier's operations, including modern slavery and social impact responsibility practices and procedures. This enables us to target key suppliers and review their information to ensure it aligns with Ashurst's approach to mitigating modern slavery risks. In 2020/21 a review of all critical vendors was undertaken with updated due diligence incorporated onto our supplier information platform as appropriate. Ashurst has an internal audit programme which covers a range of business risk areas. Updated processes for procurement and prevention of modern slavery will be included in the audit programme at appropriate intervals to assess the effectiveness of those processes.

## Training of Staff

In previous years we have focused our training on staff involved in procurement of significant contracts. This year we have re-developed the training to extend to all personnel across the global group, recognising the important role that all personnel can play in reducing the risk of modern slavery both in the activities of the firm and in their personal choices. Our training stresses, amongst other things, Ashurst's zero tolerance stance on slavery and human trafficking and reinforcing the policies and procedures we have in place. In October 2020 to coincide with our Modern Slavery Action plan, we rolled out our new Modern Slavery E-Learning course which is a compulsory compliance course for all Ashurst partners and staff. Our pro bono practice also launched a learning module on modern slavery to build on this course, for any Ashurst partners or staff wishing to learn more and engage in our Action Plan.

## Recruitment and welfare of our people

We are a leading law firm with more than 3,000 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 HR 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 assisted helpline which is a life management and personal support telephone service and is available to our employees 24 hours a day.

## 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 27 July 2021
- Ashurst Australia on 27 July 2021
- Ashurst Business Services on 26 July 2021
- Ashurst Australia Services, in its own capacity and as trustee for the Travinto Services Trust on 27 July 2021

Approved by the members of Ashurst LLP on 10 August 2021

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

Handwritten signature in blue ink, appearing to read "K. Jaeger".Handwritten signature in blue ink, appearing to be a stylized initial or name.