

Modern Slavery and Human Trafficking Statement 2026

This statement is made pursuant to S.54 of the *Modern Slavery Act 2015* (UK) and S.14 of the *Modern Slavery Act 2018*.

This statement is made on behalf of the following entities and describes the steps taken in the financial year ended April 30, 2026.

- (1) Ashurst Perkins Coie UK LLP, a limited liability partnership registered in England and Wales under number OC330252. It is a law firm authorized 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.
- (2) Ashurst Perkins Coie UK LLP's wholly owned subsidiary, Ashurst Perkins Coie Business Services Limited registered in England and Wales under number 02938506.
- (3) Ashurst Perkins Coie Australia (ABN 75 304 286 095), a general partnership constituted under the laws of the Australian Capital Territory, and
- (4) Ashurst Perkins Coie Australia Services Pty Limited in its capacity as Trustee for the Travinto Services Trust, having its registered office in Victoria.

References to "we", "us", "our", or "the firm" are to these bodies.

1. **Organizational structure, operation, activities and supply chain**

1.1 **Organizational structure**

Ashurst LLP and Perkins Coie LLP combined on June 26, 2026, forming Ashurst Perkins Coie, a global law firm.

This statement relates to the activities of the legacy Ashurst entities listed above and their respective affiliates (together **the firm**) in the financial year prior to that combination.

1.2 **Operations and activities**

During the relevant period, the firm had over 500 partners and 1,900 lawyers operating from 32 offices in 19 countries.

The firm provided commercial legal advice across a broad range of industry sectors, including banks and private capital, the digital economy, projects and energy transition, infrastructure, and real estate.

The firm operated 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.

1.3 Supply chain

The firm's supply chain consists principally of low-risk professional support services or office facilities, which support our partners, lawyers and people in their work.

In financial year 2026 (FY26), the firm had over 4,000 suppliers, with 78% of them concentrated in the United Kingdom, Europe and Australia.

The key components they supply us with are:

- **Real estate:** the 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:** organizing and booking travel and accommodation requirements.
- **Professional services:** including external training services, consultants, contractors, document services, banks, auditors, insurers, human resources and legal support services.

1.4 Modern Slavery Risk Management and Governance

The firm operates an Enterprise Risk Management (ERM) Framework, which is coordinated by a central ERM team. They work with senior management risk owners and subject matter experts to ensure our risks, including modern slavery risks, are identified, recorded and responded to appropriately.

The firm's People & Culture function oversees our modern slavery prevention measures for our own people and activities.

We have a centralized 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.

Procurement activity is closely monitored by a dedicated Third Party Risk Management (TPRM) team based in the UK and Spain. The TPRM team are primarily responsible for identifying, assessing and responding to modern slavery and human trafficking risks in our supply chains. In respect of lower risk spend, this responsibly primarily rests with the purchaser.

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

Our Social Impact team, which includes a dedicated Modern Slavery Senior Manager, partners with NFPs in the modern slavery sector, including Hestia, Sophie Hayes Foundation, Migrant Help, and

Scotland Against Human Trafficking. Together, we deliver workshops to raise awareness and to provide support for survivors of modern slavery and human trafficking, helping them to develop confidence through tailored programs in digital literacy, English language skills, and mentoring. Our volunteers play a vital role in this work. In the last financial year, they dedicated more than 360 hours of their time to support survivors of modern slavery in building confidence and working towards independence.

2. Firm policies and procedures

2.1 Overview of policies

Our policies make clear our approach to modern slavery and all forms of discriminatory or exploitative behavior and treatment.

During FY26, we reaffirmed our membership of the U.N. Global Compact, aligning our operations to the United Nations' sustainability goals where we can have the most impact: no poverty; good health and well-being; quality education; gender equality; affordable and clean energy; decent work and economic growth; industry, innovation and infrastructure; reduced inequalities; sustainable cities and communities; responsible consumption and production; climate action; and peace, justice and strong institutions.

We outline below key policies we use to mitigate risks of modern slavery and human trafficking. They are developed and implemented with engagement from key stakeholders across the firm, approved by senior management appropriate to the topic and scope, and reviewed on a regular basis.

2.2 Policies

- (a) **Code of Conduct:** sets out that we will not tolerate slavery or human trafficking in any part of our own business or in our supply chains and that we conduct our business in accordance with international human rights principles.
- (b) **Procurement Policy and Guidelines:** establishes a framework to ensure the firm procures goods and services in an ethical and sustainable way. The policy requires appropriate due diligence to be carried out, which includes reviewing for slavery and human trafficking.
- (c) **Third Party Risk Management Manual:** sets out how all third parties to the firm are incepted, including how due diligence and risk assessments are conducted and documented. The management of third parties involves monitoring steps, including options for an annual review and evaluation, rights to audit, and reports to the firm's Risk Committee for oversight.
- (d) **Workplace Behavior Code:** sets out our commitment to adhering to high standards of ethical conduct in our business activities, and to creating a respectful workplace that is free from harassment, bullying and discrimination, and where people are treated fairly. This code is supported by specific policies and procedures with respect to: bullying and harassment; sexual harassment; equal employment opportunities; and domestic violence support.

- (e) **Guidelines for Adults Working with Children:** provides guidance on safeguarding the welfare of children involved in our activities, including social impact work and work experience placements. It provides guidance on identifying signs of physical, emotional, or sexual abuse or neglect, and the action that should be taken if such signs are identified.
- (f) **Whistleblowing Protection Policy and Procedure:** encourages the disclosure of illegal or unethical conduct that may be related to the firm or conduct that places individuals at risk. This policy is designed to give individuals a way of raising these concerns safely and in the knowledge that they will be treated seriously.

2.3 **Communication and enforcement**

The firm's policies are available to employees via the intranet, while new joiners are required to read and acknowledge key policies before commencing their roles. The existence and content of policies relating to modern slavery and human trafficking are reinforced through mandatory training.

Failure by employees to adhere to the standards in our policies is a breach of the firm's professional standards of conduct, which could lead to disciplinary action.

Suppliers are issued with a copy of our Supplier Business Practices (SBP) Schedule (which is embedded into our purchase order or any bespoke contract that is negotiated) as part of supplier onboarding or renewals. Our standard terms and conditions (T&Cs) used with suppliers provide the right to terminate where a remediable breach of the T&Cs (including the SBPs) is not rectified following notice of the breach.

3. **Assessing and managing risks**

3.1 **Slavery and human trafficking risk**

We operate in the legal sector, which, as a regulated sector, is generally assessed as low risk for instances of modern slavery or human trafficking. We recognize that the greatest risk of modern slavery and human trafficking is in our supply chains.

Following our FY26 risk assessment review, the key modern slavery and human trafficking risks in our supply chains continue to relate to:

- Cleaning services
- Fabric and food products (e.g. sports kits, marketing merchandise, and coffee)
- Electronics.

3.2 **Assessing and managing risks in our supply chain**

Our TPRM team operate a supply chain risk management framework, integrated with our ERM framework, which allows us to identify, assess, monitor and mitigate modern slavery and human trafficking supply chain risks.

At the stage when new purchases are requested, we employ a triaging tool as part of our supplier intake risk management and contract management system, which highlights items to be purchased that could carry an increased risk of modern slavery.

For non-material purchases, but where risks are elevated, the requestor is directed to tailored guidance on how to conduct due diligence and purchase responsibly.

For material new purchases, the TPRM team will be involved in the purchasing decision and will consider key factors to assign a risk level to the request, which is calculated using a likelihood/severity scoring matrix. This risk assessment will determine the extent of due diligence during the supplier onboarding and for ongoing monitoring.

Procurement and TPRM oversight will also apply to material contract renewals, and renewals for purchases assessed as higher risk, so modern slavery and human trafficking risks are reassessed as part of the renewal process.

See section 4 for how we undertake due diligence.

Our Head of TPRM is a member of the Legal Sustainability Alliance Procurement Working group, working with legal sector peers to evolve sustainable procurement guidance, streamline the collection of supplier data and develop shared training resources.

Our Supplier Business Practices (SBPs), included in all supplier contracts, specify that suppliers:

- Must comply with applicable anti-slavery and human trafficking legislation, regulations and codes and prohibit the direct or indirect use of child, forced or involuntary labor in any form or association with slavery or human trafficking.
- Shall provide fair pay and working conditions.
- Must respect the rights of workers to form and join a trade union or other association for the protection of their interests.
- Notify the firm of any actual or suspected slavery or human trafficking in a supply chain and cooperate with the firm and undertake mitigation actions in respect of any non-compliance.
- Must also contract on equivalent terms with their own suppliers.

We have an external SpeakUp portal, which is available to our suppliers and other interested persons, to raise concerns that any of our suppliers are engaging in modern slavery.

3.3 Assessing and managing risks in our operations

The majority of our workforce is directly engaged by the firm, while a centralized People & Culture team and Finance team manage recruitment, support for our people and payroll. This reduces the risk of individual offices or managers engaging in inappropriate labor practices.

We have a dedicated Rewards and Benefits team responsible for the ongoing monitoring and compliance of our pay and benefits across jurisdictions to meet legal requirements. We pay our employees at least the minimum wage in their local jurisdiction. We pay a minimum of the UK Living Wage in Glasgow and the London Living Wage in London.

Where we use third parties to engage contractors, we utilize a small, carefully selected group of reputable recruitment providers.

We have background screening appropriate to roles and ensure all of our people have the right to work in the relevant jurisdiction.

We provide a dedicated employee assistance program (EAP), which is available 24/7 and provides confidential support for our people's mental, physical, social and financial wellbeing, including access to counselling via a phone line, web platform and app. We have the SpeakUp portal where people can raise concerns relating to workplace conduct, regulatory noncompliance, or where they can raise a whistleblowing disclosure. We have mental health first aiders and Respect Champions across our offices and concerns can also be raised directly with our Ethics Counsel or the senior People & Culture management team.

4. Due diligence and remediation

4.1 Supplier due diligence

Following the risk assessment processes outlined in section 3 above, appropriately calibrated due diligence processes will apply.

Desk-based reviews will be conducted by our internal team of specialist third party risk analysts who will produce a report to be considered within the procurement process. More detailed supplier due diligence questionnaires (DDQs) will also be requested where the material purchase is assessed as higher risk, and this information will be included in the procurement report.

During FY26, we moved from KY3P to Prevalent, an industry recognized TPRM software risk assessment platform, to facilitate the DDQs workflow, which assists with scoring, investigation, monitoring and resolution of any remediation requests issued to a supplier.

Where concerns are identified with respect to a proposed purchase, the request will be escalated in accordance with the ERM framework and may result in an alternative supplier being identified.

4.2 Remediation

No incidents of modern slavery were identified in the firm's operations or supply chain during FY26.

5. Training

We require all of our people to complete an e-learning course on modern slavery and workplace behaviors annually.

This course explains what modern slavery is, how it can be relevant in the context of a global law firm and warning signs to look for. It is designed to equip our people with an understanding of modern slavery, its risks, the firm's policies and the responsibilities required to manage and report concerns within the firm's operations and supply chains. It was developed internally by our Risk team, with input from modern slavery subject matter experts across the firm.

The content is reviewed regularly in response to legislative and regulatory changes and to reflect any insights from our TPRM team regarding modern slavery risks within our supply chain.

To successfully complete the training, employees must achieve a minimum pass score of 80%. We monitor the number of employees that complete this training.

Completion of further mandatory training modules is required for teams most heavily involved in purchasing (e.g. IT, operations and marketing). These modules contextualize modern slavery risks and explain the processes that the TPRM team have put in place to mitigate those risks.

We also deploy Respect at Work training across our offices to demonstrate our commitment to building collaborative and respectful workplace cultures.

6. Monitoring and evaluation

In assessing the effectiveness of our actions to prevent and respond to slavery and human trafficking, we take the following steps:

6.1 Assessing the effectiveness of training

We assess completion rates of our compulsory modern slavery e-learning. During the last 12 months, 80% of our personnel completed the training.

6.2 Internal review of our policies and procedures

We regularly review our policies and procedures, including those relating to due diligence and ongoing monitoring, to ensure they are in line with regulatory requirements and best practice.

6.3 Monitoring and reporting of key risk indicators

Key risk indicators (KRIs) are reported quarterly to the ERM Team. In addition to monitoring any incidents of slavery or human trafficking, we monitor compliance with the purchase request intake process and the percentage of critical suppliers assessed as high risk. Our KRIs remain within our risk appetite.

6.4 Supplier audits

We conduct remote desk-top audits on our supply chain using KY3P, which covers questions on the ethical and fair treatment of workers as well as slavery and human trafficking risks. We also undertake thematic reviews of spending in higher-risk areas, while continuing to provide support to our people who are engaged in non-material spending in those areas.

6.5 External scrutiny

Our modern slavery policies and procedures 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 approach to assessing and managing risks of modern slavery and human trafficking in our business and supply chains.

7. Actions in the past 12 months and looking ahead

7.1 Over the past 12 months, we have undertaken the following actions:

- (a) [Implementation of a new end-to-end supplier intake, risk management and contract-management system.](#)

As set out in section 3 above, this has increased visibility of and support around making purchases that could have an elevated slavery and human trafficking risk.

(b) **Interactive spend guidance tool**

This guidance tool enables tailored advice and pre-approved supplier lists to be given to our people on non-material spending for goods at increased risk of modern slavery.

(c) **Workplace health and safety: Supporting safe and fair workplaces.**

We implemented our external SpeakUp portal allowing anonymized whistleblowing and reports of inappropriate behaviors.

We also: conducted compulsory in-person training on Respect at Work; introduced Respect Champions to support our workplace behavior policies and procedures; and developed a framework for Respect Focus Groups to support ongoing engagement with our people on these topics.

We launched a new global health and safety hub (an internal web portal dedicated to health and safety matters) and enhanced workplace health and safety event reporting tool. The hub provides guidance on all safety matters, while the reporting tool supports timely, accurate submission of incidents, injuries, hazards, and near misses.

7.2 Looking ahead to the next 12 months:

- (a) We will continue to deliver Respect at Work training across our offices worldwide and plan to run a series of focus groups, building on activity in our APAC region to continue engagement with our people.
- (b) We are updating our ongoing due diligence process through a jurisdictional and sectoral lens for higher-risk purchases.
- (c) A new Procure to Pay finance system will be implemented enabling enhanced visibility of all spending, more-accurate reporting and a more-strategic approach to risk management.
- (d) We will develop a supplier engagement program covering modern slavery risk assessment, due diligence and remediation, which will be implemented in FY28.
- (e) Workshops will be hosted by our Social Impact and TPRM teams with key internal stakeholders to update on them on lessons from our work with survivors of modern slavery, so their experiences continue to inform our policies and procedures.

8. Communication

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

9. Consultation and board approval

This statement was prepared by the Risk Governance Directorate with input from the TPRM, People & Culture, and Social Impact teams, and was reviewed by the Co-Global General Counsel based in the UK. Each of the individual entities comprising the firm and noted below, were consulted on the development of this statement.

This statement was:

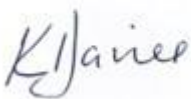
Approved by the boards of the relevant entities:

- Ashurst Perkins Coie UK LLP on 23 July 2026
- Ashurst Perkins Coie Australia on 23 July 2026
- Ashurst Perkins Coie Business Services on 17 July 2026
- Ashurst Perkins Coie Australia Services, in its own capacity and as trustee for the Travinto Services Trust on 23 July 2026

Approved by the members of Ashurst Perkins Coie UK LLP on 18 August 2026

Signed by the Co-Global Chais and Co-Global CEOs of Ashurst Perkins Coie, being designated and responsible members and directors of each respective entity on their behalf.

Signed



Karen Davies

Co-Global Chair



Paul Jenkins

Co-Global CEO

Signed



Brian Eiting

Co-Global Chair



William Malley

Co-Global CEO