



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

We are committed to working to ensure that there is no modern slavery or human trafficking in our supply chain or in any part of our business. This commitment is an integral part of our policies and our approach to human rights. This approach is informed by the UN Guiding Principles on Business and Human Rights.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 with respect to the financial year ending 30 April 2016 and sets out the steps Herbert Smith Freehills¹ has taken to seek to ensure that slavery and human trafficking does not occur in our business operations or within our supply chain.

OUR FIRM²

Herbert Smith Freehills is a global professional services firm providing legal services to clients wherever those services are required by them across a number of jurisdictions. We have a global offering with 25 offices across 18 countries spanning Africa, Asia, Australia, Europe, the Middle East and the US. Globally, we employ approximately 5,000 people.

For further details on the firm's structure please click [here](#).

OUR SUPPLY CHAIN

As a professional services firm we are office based and our supply chain therefore predominantly consists of goods and services purchased in order to assist our people to deliver legal services such as property, maintenance, professional services, software and information technology. We also work in conjunction with other law firms and legal experts.

We have conducted an initial assessment of the firm's own business and supply chain and consider that there is minimal risk of modern slavery or human trafficking.

We have introduced a procurement platform based in the UK that includes due diligence of our suppliers in order to identify where modern slavery and trafficking risks lie. This allows us to select parties to work with us who adhere to our high standards and policies. In the event that we become aware of a case of modern slavery or trafficking occurring within our supply chain, we will work to remediate that through legitimate and proportionate processes.

During 2015 we developed our [Responsible Procurement Policy](#) which applies to our suppliers globally and sets out the rules and standards that we expect each of them to adhere to and observe. In the UK we have met with key suppliers to discuss the concepts within the Responsible Procurement Policy, to understand their approach and to encourage change and innovation initiatives which align with ours. In early 2016 we also began issuing our major suppliers globally with our Procurement Compliance Standards which set out our expectations of suppliers to the firm. This remains an ongoing project.

OUR POLICIES

In addition to the Responsible Procurement Policy, we have several other policies that together address our approach to the identification of modern slavery risks and the steps to be taken to prevent modern slavery and human trafficking in its operations. These include:

- **International standards of conduct:** specifies the mandatory rules of the firm that must be followed by all partners, consultants, contractors and employees of Herbert Smith Freehills³.
- **Anti-money laundering:** applies to all our people at Herbert Smith Freehills and sets out policies and procedures to prevent the commission of financial crime and the movement of money which has derived from crime.
- **Whistleblowing:** details the procedures all our people should follow if they have a concern of any kind with respect to the firm, including in relation to compliance with policies, our suppliers or practices within the business or supply chain.
- **Anti-Bribery and Corruption:** applies to all partners, consultants, contractors and employees of the firm, as well as associated

third parties such as suppliers, and sets out rules with regard to bribery and corruption.

- **Human rights:** we recognise that we have a responsibility to respect internationally recognised human rights and we seek to conduct our activities in a manner that respects and supports the protection of human rights.

TRAINING AVAILABLE TO OUR PEOPLE

Herbert Smith Freehills is committed to educating our people with respect to the risks our firm faces in relation to modern slavery and human trafficking and also how these risks can be negated. In the financial year 2015/16 we worked with the Ethical Trading Initiative and Anti-Slavery International to provide our key people who have direct responsibility for supply chain management, our General Counsel & risk team, regional operations directors and members of the HR team responsible for recruitment with formal training specifically on anti-slavery and human trafficking.

LOOKING AHEAD

In the financial year ending 30 April 2017 we aim to:

- publish our human rights policy;
- become a signatory to the United Nations Global Compact;
- provide further training on anti-slavery and human trafficking to our people as appropriate; and
- continue our review of our procurement process and engage further with our suppliers outside the UK with respect to modern slavery and human trafficking risks.

BOARD APPROVALS

Herbert Smith Freehills Pro Bono & Citizenship Council approved this statement on the 10 August 2016.

Herbert Smith Freehills LLP Council approved this statement on behalf of the members of Herbert Smith Freehills LLP on 21 September 2016.

Exchange House Services Limited board of directors approved this statement on 13 October 2016.



Sonya Leydecker
Chief Executive Officer
Herbert Smith Freehills LLP

September 2016



Ian Cox
Director
Exchange House Services Limited

October 2016

1 This statement is made on behalf of Herbert Smith Freehills LLP and its service company Exchange House Services Limited, which are each required to make a statement pursuant to s 54 of the Modern Slavery Act 2015.

2 Herbert Smith Freehills LLP and its affiliated and subsidiary businesses and firms operating across the world and Herbert Smith Freehills, an Australian Partnership, are separate member firms of the international legal practice known as "Herbert Smith Freehills".

3 References to employees of Herbert Smith Freehills also means employees of Exchange House Services Limited.