

Date: April 21, 2023

Purpose of this statement

This statement (Statement) is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act) on behalf of Reed Smith LLP (Reed Smith), which is incorporated in England and Wales (Reg. No. 303620). Reed Smith is associated with Reed Smith LLP of Delaware, USA (Reed Smith U.S.).

Recorded in the Statement are the actions taken by Reed Smith during 2022 to ensure that modern slavery and human trafficking do not take place within its supply chain and are not in any way associated with its business. The Statement has been drafted following a thorough process of review by our Modern Slavery Working Group, which included an analysis of our performance against key performance indicators as defined in previous statements.

Our prior modern slavery and human trafficking statements can be found here:

- [2022 statement](#)
- [2021 statement](#)
- [2020 statement](#)
- [2019 statement](#)
- [2018 statement](#)
- [2017 statement](#)

Tamara Box, Europe & Middle East (EME) managing partner and designated member of Reed Smith, approved the Statement on April 21, 2023.

Our commitment

Our goal is to always “do the right thing,” and to work to the highest professional standards. Our commitment to these goals is reflected in how we run our firm.

Our Code of Conduct ensures that all of Reed Smith’s actions are governed by the firm’s core values – Integrity, Excellence, Teamwork and Respect, Innovation, and Impact. We are committed to promoting these values, and some of the ways we do this include our strong commitment to being a responsible business, as evidenced through our [Responsible Business program](#); our support for various human rights initiatives; and our commitment to pro bono projects that protect human rights.

The UK government proposed an amendment to the Act in 2020 to require that any statement produced pursuant to the Act must include information on six areas. Our Statement details our response to each of the six proposed mandatory areas.

(1) Our structure, business, and supply chains

Reed Smith and Reed Smith U.S. provide legal services and operate through offices, and associated law firms, in Belgium, China, France, Germany, Greece, Hong Kong, Kazakhstan, Singapore, the UAE, the UK, and the United States. More information regarding our structure can be found at [reedsmith.com](https://www.reedsmith.com).

We are committed to working towards the elimination of any possibility of slavery in our supply chain. Reed Smith’s supply chain is similar to the supply chains of other professional service businesses. The key services we procure are property space,

facilities management, professional services, travel services, and information technology.

(2) Our policies

We have a [Modern Slavery and Human Trafficking Policy](#) (Policy) and a Code of Conduct, which together set out the behavior we expect of our personnel. We also have a Whistleblowing Policy to enable the reporting of concerns. Reports can also be made anonymously using the EthicsPoint system. Our policies and information regarding EthicsPoint are available to all staff through the Reed Smith intranet.

(3) Our due diligence procedures

Our Supplier Code of Conduct requires that all suppliers comply with the principles of our Policy. These principles include various employment and human rights principles, including requirements to support the elimination of child labor and implement working hours, wages, and benefits that provide a fair living wage for reasonable hours. More details can be found in our [Supplier Code of Conduct](#).

We have completed risk assessments of the suppliers to Reed Smith's UK offices. As part of this exercise, the modern slavery policies of those suppliers were collected and reviewed. Suppliers whose policies were not available on their websites were contacted in order to obtain copies of their policies. We have started the rollout of this exercise to the suppliers to our Europe and Middle East offices, and this review will continue into 2023.

Suppliers: U.S. business

All new arrangements with suppliers include a commitment by the suppliers to comply with the principles of our Policy, which are outlined in our Supplier Code of Conduct. We consider any

person or organization to whom payment is made by Reed Smith U.S. to be a supplier. Reed Smith U.S. ensures all new suppliers (except entities such as courts and notaries) are contacted and informed that they are required to comply with the Policy. As part of this process, a declaration is required from all suppliers to confirm compliance with the Policy. Further, we require all suppliers to certify that they have a program in place to ensure that modern slavery and human trafficking do not exist within their operations and supply chains and that they require compliance from their own suppliers. If a supplier certifies that it has such a policy in place, we request a copy of their policy.

(4) Risks of slavery or human trafficking in relation to our supply chain and business

There are potential risks of modern slavery and human trafficking in our supply chain, particularly for our onsite services contracts. Our suppliers are principally large organizations that we expect to invest time and effort into ensuring there is no modern slavery within their businesses and supply chains, which minimizes the potential risk in this area. Further, Reed Smith has a Supplier Code of Conduct, which we require all our suppliers to adhere to.

(5) Our effectiveness, measured against performance indicators that we consider appropriate

During 2022, our cross-functional Modern Slavery Working Group continued to meet quarterly to discuss the firm's modern slavery initiatives and the level of risk in this area. Generally, the group assessed the risk in relation to modern slavery and human trafficking occurring in our supply chain as low. We are aware of the scale of the problem and the efforts of authorities in many countries that struggle to deal effectively with these serious crimes. We continue to monitor and work to improve the

systems we have in place to ensure that our business and supply chain are free from modern slavery and human trafficking.

UK Government guidance is that the effectiveness of measures taken by an organization to ensure that modern slavery and human trafficking are not taking place in its supply chain or business should be measured against key performance indicators. Our Modern Slavery Working Group reviews the following key performance indicators:

- The number of slavery suspicions reported through the Modern Slavery Policy. In 2022, no modern slavery suspicions were reported.
- Employees' e-learning statistics. During 2022, our modern slavery and human trafficking course was sent to 935 people, of which 868 people completed the course, a total of 93%.
- Responses from our suppliers during the due diligence processes. We require that all our suppliers agree to adhere to our Supplier Code of Conduct as part of our due diligence processes.

Other Reed Smith human rights initiatives undertaken in 2022

A summary of our support in these areas includes:

- **Lawyers Without Borders**
Lawyers Without Borders is an international not-for-profit organization that develops programs and materials to improve access to justice. Amongst other things, Lawyers Without Borders works to combat the heinous crime of human trafficking in developing countries through capacity-building training and the development of training materials. We have worked with Lawyers Without Borders since 2014.

During 2021 and 2022, a team of around 20 Reed Smith lawyers across our EMEA offices produced guidance for trainers (including prosecutors, judges, police officers, labor inspectors, and lawyers) on the crimes of human trafficking, child labor, and forced labor in Bolivia. The manual provides trainers with a detailed overview of the crimes' underlying causes and trends and their impact on society, along with a full appraisal of relevant domestic and international legislation. This guidance will assist with enforcing human trafficking, child labor, and forced labor laws in Bolivia to protect and secure justice for victims.

- Representation of individuals in Hong Kong
Our Hong Kong office advised domestic workers in their respective employment disputes and labor tribunal proceedings against their former employers.
- Commercial legal advice
We provide commercial legal advice to a number of charities and not-for-profits that support victims of modern slavery and human trafficking. Our advice allows them to focus their limited resources on supporting their beneficiaries.
- Domestic Workers Working Group
We set up a Domestic Workers Working Group across our Asia offices to scope opportunities to help domestic workers and the non-governmental organizations that support them with pro bono work.
- Other
Our commitment to supporting human rights initiatives also involves fighting for the protection of human rights and labor rights. This includes our pro bono team's role advising the Geneva Declaration on Human Rights at Sea, a landmark publication that protects the human rights of people living, working, and crossing the sea. Furthermore,

our commitment to pro bono work is significant. Reed Smith lawyers dedicated more than 92,000 hours to pro bono work in 2022.

We continue to explore possibilities to provide pro bono support to a number of other modern slavery and human trafficking charities.

(6) Training and capacity building available to our staff

Our cross-functional Modern Slavery Working Group continues to focus on raising awareness throughout Reed Smith, and, in particular, informing individuals of the obligations contained in the Act and the presence of modern slavery and human trafficking throughout the world.

In 2022, we rolled out a new modern slavery eLearning package. This course will be completed every two years.

Looking ahead

In the financial year ending December 31, 2023, we aim to:

- Continue to assess the modern slavery and human trafficking risks in our supply chain from our existing and new suppliers.
- Use an outside agency or resource to help review our modern slavery and human trafficking commitments to further improve our work in this area.
- Continue our pro bono work to support international human rights projects.

Tamara Box

Date April 21, 2023

Designated member of Reed Smith LLP

EME managing partner