

Date: April 23, 2024

Purpose of this statement

This statement (Statement) is made pursuant to section 54(1) of the Modern Slavery Act 2015 (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 2023 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 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:

- [2023 statement](#)
- [2022 statement](#)
- [2021 statement](#)
- [2020 statement](#)
- [2019 statement](#)
- [2018 statement](#)
- [2017 statement](#)

Gregor Pryor, Europe & Middle East (EME) managing partner and designated member of Reed Smith, approved the Statement on April 23, 2024.

Our commitment

Our goals are 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 toward 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

services 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. This includes 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 and Paris 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 will roll out this exercise to the suppliers to our other Europe and Middle East offices in 2024.

Suppliers: U.S.

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. Work is being undertaken to strengthen and improve the systems in place to collect and check information provided by suppliers to Reed Smith U.S.

(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 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 requires all our suppliers to adhere to its Supplier Code of Conduct, which references our Policy.

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

During 2023, 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 continues to assess 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 our Policy. In 2023, no modern slavery suspicions were reported.
- Employees' eLearning statistics. Our modern slavery and human trafficking eLearning course was completed by 93% of Reed Smith staff in our EMEA offices (excluding Hong Kong) when launched across the region in February 2022. Of 250 new joiners in 2023, 231 completed the course (92.4%).
- 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 2023

Our commitment to pro bono work is significant. Reed Smith lawyers dedicated more than 82,000 hours to pro bono work in 2023. We continue to explore possibilities to provide pro bono support to a number of other modern slavery and human trafficking charities. A summary of our support in these areas includes:

- Lawyers Without Borders

Lawyers Without Borders (LWOB) is an international not-for-profit organization that develops programs and materials to improve access to justice. Among other things, LWOB 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 LWOB since 2014.

In 2023, a cross-office team assisted LWOB in researching a program in Liberia focused on legislative reform and enforcement in respect of child labor. A child labor bill is currently being considered by the Liberian legislature, and LWOB turned to Reed Smith to produce a pocket guide to ensure practitioners on the ground have the tools to be able to understand how to use the new law in their daily work once the law is passed. Our team conducted research and considered the key provisions of the child labor bill to produce a practical guide, including the offenses under the law, how to identify child labor, permitted work, investigating child labor and relevant stakeholders.

- Representation of individuals in Hong Kong

Our Hong Kong office provides advice to domestic workers in their respective employment disputes and labor tribunal proceedings against their former employers.

In 2023, working with Justice Without Borders, a non-profit supporting migrant domestic workers, training sessions were organized in our Singapore and Hong Kong offices on the common issues these workers face in those jurisdictions.

- 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.

- Other

Reed Smith collaborates with the Italian Coalition for Civil Liberties and Rights and other international law firms to support the Rule 39 Pro Bono Initiative. The project supports vulnerable individuals, and the NGOs working with them preparing and lodging applications before the European Court of Human Rights, including requests for interim measures under Rule 39 of its Rules of Court. These are urgent measures to prevent irreparable harm to fundamental rights such as the right to life and protection against torture.

(6) Training and capacity building available to our staff

Our cross-functional Modern Slavery Working Group focuses 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.

As mentioned above, modern slavery and human trafficking eLearning was first launched to all staff in EMEA (except for Hong Kong) in 2022 and will be repeated every two years. We also ask all new joiners to complete it.

Looking ahead

In the financial year ending December 31, 2024, we aim to:

- Continue to assess the modern slavery and human trafficking risks in our supply chain from our existing and new suppliers.
- Continue our pro bono work to support international human rights projects.

Gregor Pryor

Date: April 23, 2024

Designated member of Reed Smith LLP

EME managing partner