ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FINANCIAL YEAR ENDING 31 MARCH 2022

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") on behalf of Holman Fenwick Willan LLP for the financial year commencing 1 April 2021 and ending 31 March 2022.

Our structure

Holman Fenwick Willan LLP is part of an international law firm group, advising clients on all aspects of international commerce. We have over 600 lawyers and fee earners working in offices across the Americas, Europe, the Middle East, Asia and Australia. To find out more about the nature of our business and full legal structure, please go to **www.hfw.com**.

Holman Fenwick Willan LLP ("HFW") operates through the London, Brussels and Shanghai offices. It is a limited liability partnership registered in England and Wales (with registered number OC343361) and authorised and regulated by the SRA. The firm's SRA registration number is 509977. The firm's registered office is at Friary Court, 65 Crutched Friars, London EC3N 2AE. HFW is an Accredited Living Wage Employer, meaning the firm has committed to pay all employees a fair living wage.

Policies in relation to slavery and human trafficking

As part of our commitment to combatting modern slavery, HFW has a number of policies and procedures relevant to modern slavery and human trafficking, which set out our commitment to acting ethically in all our business dealings. These policies are made available to all HFW employees on our intranet.

These policies include:

- Anti-Bribery & Corruption Policy
- Modern Slavery Policy
- Whistleblowing Policy

These policies set out the firm's responsibilities and the responsibilities of all individuals working for or with the firm, as well as providing information and guidance to those working for or with the firm on how to recognise and deal with modern slavery and/or human trafficking issues. Internal control systems and procedures are subject to periodic review to ensure that they are effective.

Due diligence processes

HFW has established long-term relationships with many of the service providers the firm engages, including but not limited to, catering, cleaning and hospitality providers. HFW does not make demands of such suppliers that may result in them violating applicable modern slavery regulation.

To monitor and reduce the risk of modern slavery and human trafficking occurring within our supply chain, HFW undertakes appropriate due diligence on potential suppliers and aims to review the suppliers' modern slavery statements (where they are required to have one) and require the supplier to contractually warrant that they are compliant with applicable modern slavery legislation and that they are not involved in, complicit with or associated with slavery and/or human trafficking.

Risk assessment and management

Given the nature of our work and the recruitment processes we have in place, employees directly employed by HFW present no risk from a slavery and/or human trafficking perspective.

In relation to HFW's supply chain, the majority of our suppliers are UK-based and supply standard goods and services that are low risk for modern slavery/human trafficking. We work with reputable suppliers and expect them to implement a zero-tolerance approach to modern slavery and human trafficking.

We will assess any instances of non-compliance on a case by-case basis and will tailor remedial action appropriately.

The Management Board has overall responsibility for ensuring the Anti-Modern Slavery Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Key objectives for the financial year 2022/2023

HFW is currently undertaking a comprehensive review of its global procurement processes with the aim of ensuring that there is a consistent approach to supplier onboarding and due diligence across the HFW network.

We are looking into new modern slavery online training to roll out across the firm globally.

Training on modern slavery and trafficking

We are committed to ensuring our staff are equipped to recognise the risks of modern slavery within our business and supply chains. Guidance regarding our policies and procedures is made available to all employees on our intranet.

This statement was approved by HFW's Management Board on 22 September 2022. This statement will be reviewed annually and made available on our website.

Signed:



JEREMY SHEBSON
Managing Partner and Designated Member

© 2022 Holman Fenwick Willan LLP. All rights reserved. Ref 003644 Sep 22