Clifford Chance

UK Modern Slavery Act Transparency Statement FY26

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Introduction

This statement describes the steps taken during the financial year ended 30 April 2026 ("FY26" or the "reporting period") to identify, prevent, manage and mitigate the risk of modern slavery[1] occurring in our business operations and supply chains, together with the progress made to strengthen our approach.

It is published in accordance with section 54 of the UK Modern Slavery Act 2015 (the "UK Modern Slavery Act") and section 14 of the Modern Slavery Act 2018 (Cth) (the “Australian Act”).

This statement has been approved by the Executive Committee ("ExCo") and will be signed by the Global Managing Partner on behalf of the firm and published on our website.[2]

[1] Modern slavery is an umbrella term that is used to describe a wide range of crimes and severe human rights abuses, including forced labour, slavery and human trafficking. The term is used to describe the severe exploitation of people for personal or commercial gain and refers to situations where victims are forced to work through violence, intimidation, fraud, financial bondage or confiscation of their personal documentation or are trafficked for exploitation. Examples of modern slavery include debt bondage, child slavery, domestic servitude, forced marriage, human trafficking and forced labour. For the purpose of this statement, we use the term, 'Modern Slavery'.

[2] This statement, along with previously published statements, can be accessed from our website.

2 Business operations, organisational structure and supply chains

Clifford Chance is the collective name for an international legal practice comprising Clifford Chance LLP and its subsidiary entities. These entities may be branches, partnerships or separate corporate entities. Our principal partnership is Clifford Chance LLP, a limited liability partnership incorporated under English law.

We have 35 offices in 21 countries and a headcount of more than 7,366, including lawyers and business professionals. Led by some 675 partners, each of the firm's offices is managed by one of our senior partners or directors. Clifford Chance provides legal services across key markets in the Americas, Asia-Pacific, Europe, the Middle East and Africa, and across twelve global product groups covering transactional and advisory matters. Our clients predominantly comprise banks, corporate enterprises and businesses operating in the private capital area.

Our supply chains relate to our global office-based professional services business – supplying personnel, goods and services to support the services that we, in turn, provide to our clients. Some of our suppliers are local, for example, cleaning or catering services – whilst others are engaged on a global scale; for example, IT services.

Based on our ongoing assessment, we believe we are at a low risk of modern slavery from within our own business operations. We plan to review our approach every three years.

We have based our assessment on the following factors:

- Our business primarily consists of permanently employed and skilled colleagues working in professional, office-based environments. We do not employ migrant workers[3] and ensure that we verify the information applicants provide to us as part of our pre-employment screening and reference checks. This is an essential part of our recruitment process.
- Our colleagues are engaged in accordance with relevant workplace laws and conditions. We are also committed to supporting their health and wellbeing, and our Global People Survey indicates that they view Clifford Chance as providing a positive and inclusive workplace, with 87% expressing pride in their association with the firm.
- We are a professional services firm strictly regulated by professional regulatory bodies in each of the jurisdictions in which we operate.

[3] By migrant worker, we refer to a low-wage or an unskilled worker who migrates, or who has migrated from, one country to another for economic reasons. In contrast, we may employ professionals, who have migrated from one country to another.

We consider there to be a greater risk of modern slavery occurring within our supply chains compared to within our own business operations, with high-risk categories for modern slavery including cleaning, construction, hospitality (catering and hotels), transportation (airlines and car services) and IT services (electronics, e-waste and security). We have identified these high-risk categories based on our understanding of modern slavery risk factors, credible reporting by third parties such as United Nations bodies, and the nature of these categories, including the types of workers and products used in relevant supply chains.

Our Supplier Management and Sustainable Procurement Programmes help to strengthen the resilience and transparency of our supply chains by ensuring that the way we purchase goods and services, and the suppliers we work with, supports ethical business practices, contributes to sustainable economic development, and keeps us aligned with evolving regulatory and stakeholder expectations.

Please refer to the Due Diligence, including Risk Assessments section of this statement for more detail regarding our processes and procedures for identifying and addressing the risk of modern slavery in our supply chains.

For more information about us, our business, organisational structure, entities, supplier management and sustainable procurement approach, please refer to the who we are and how we work and supplier management sections of our website.

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Our policies and governance

Clifford Chance has agreed to support and respect internationally recognised human rights, both as part of our commitment to the UN Global Compact and consistent with the UN Guiding Principles on Business and Human Rights. This includes seeking to appropriately identify and address potential adverse human rights impacts, including modern slavery, within our business operations and supply chains.

Our modern slavery response is overseen by the central Compliance team, with oversight from the Chief Risk and Compliance Officer. Global Procurement is responsible for sourcing and supplier management, including the Global Procurement Policy, Supplier Relationship Management (SRM) framework, Supplier Code of Conduct and Standards and third-party risk management processes.

Individuals within the firm who own and manage third-party relationships in our supply chains are also provided with education and resources on the practical implementation of our organisational policies, including Human Rights & Modern Slavery. For details, please refer to the Training and Capacity Building section of this statement.

Led by the Global Managing Partner, the ExCo governs and oversees the firm's day-to-day operations, strategic direction and execution of business plans, including the firm's growth strategy and risk appetite. The ExCo meets regularly, operating with a defined annual schedule of business. The Responsible Business Board plays a central role in overseeing the firm's responsible business strategy as set by the ExCo. It ensures the strategy is effectively implemented, aligned with the firm's values, and responsive to emerging issues and stakeholder expectations. For more information, please refer to our website and our Responsible Business Report.

We summarise below the key policies and documents that inform our approach:

Our Code

The firm's values-based Code was created to help ensure that the firm's values are demonstrated in our people's behaviours and actions, both internally and externally. The principle of acting responsibly, as set out in our Code, includes endorsement of the objectives of our Modern Slavery Policy by the firm's ExCo, the application of our Modern Slavery Policy throughout all the firm's offices, and working collaboratively with our suppliers to ensure that they have appropriate technical and organisational measures in place to meet our requirements to be a supplier to Clifford Chance.

Whistleblowing Policies & Reporting Channels

The 'Speak-Up' pillar of our Code encourages everyone to raise concerns regarding unacceptable behaviour and conduct, which could include modern slavery. Our Internal Reporting Processes and Requirements Policy sets out the process and appropriate channels to report concerns about unethical and unlawful behaviour and lack of organisational integrity. Our global Whistleblowing Policy also includes reporting channels for actual or potential breaches of the firm's rules on professional standards and practice. The firm has engaged Navex Global, an independent service with trained, impartial staff available 24/7, to provide a confidential channel for reporting concerns. The firm includes information and mechanisms available to the public on our website, including a centralised mailbox dedicated to addressing complaints and/or concerns connected with the firm's business operations, including modern slavery. Our supplier management website includes a point of contact should our suppliers have any queries and/or concerns, including in relation to modern slavery, and our public website also includes jurisdiction-specific guidance on regulatory complaints procedures (where available) in countries in which we operate.

Human Rights Policy

As a firm we have agreed to support and respect internationally recognised human rights, both as part of our commitment to the UN Global Compact and consistent with the UN Guiding Principles on Business and Human Rights. Our Human Rights Policy details our approach for identifying and addressing potential adverse human rights impacts, including modern slavery, within our business operations and supply chains.

Modern Slavery Policy

Our Modern Slavery Policy details our approach to ensuring that modern slavery does not occur in our business operations and supply chains, including any forced, bonded or compulsory labour, or any other forms of slavery, child labour or human trafficking.

Enterprise Risk Management Framework

Our Enterprise Risk Management Framework is designed to identify key risks, including but not limited to, modern slavery, affecting our business, and address their likelihood, impact and how quickly they may materialise. We strive to refresh and update our risk assessment regularly to ensure that we better identify, manage and monitor any risks.

Living Wage

The firm is a part of the Living Wage Scheme in the UK. We use a total reward approach for each colleague, which recognises the role performed and their individual performance. We aim to pay fairly and competitively by comparing our salaries with those paid by select, comparable organisations to colleagues performing at a high level in similar roles.

Supplier Code of Conduct & Standards

Our Supplier Code of Conduct sets out our expectations of our suppliers; it acts as our statement of intent as to what is important to us and what we in turn expect of our suppliers. This includes steps to respect human rights and ensure that all forms of slavery and human trafficking do not occur in our business operations and supply chains. We seek to drive our suppliers' adoption of and adherence to the principles of our Supplier Code of Conduct and minimum standards and/or ensure they have equivalent standards in place.

Global Procurement Policy

Our Global Procurement Policy governs how we procure goods and services for our firm; it outlines our minimum standards for pre- and post- contract management and is underpinned by our Sourcing Process and SRM Framework.

4 Due diligence, including risk assessments

Our objective is to maintain supplier relationships that reduce the likelihood of modern slavery occurring in our supply chains. Our approach includes clear supplier expectations, risk-based due diligence at onboarding, and ongoing monitoring during the supplier relationship.

We apply a tiering model to our direct suppliers to help prioritise oversight. Tier 1 suppliers typically include strategic relationships critical to our operations; Tier 2 suppliers are important, with medium to high value and risk characteristics; and Tier 3 and Tier 4 suppliers are more transactional, with lower inherent risk profiles.

At the outset of engaging a new supplier, a procurement risk assessment is completed in our third-party risk management system to evaluate relevant risk factors, including modern slavery, and to determine the level of due diligence required.

For strategic and tactical sourcing engagements, we issue an assessment questionnaire to gather information on supplier policies and practices, including labour and human rights controls and steps taken to mitigate modern slavery risk. Where indicated, we undertake enhanced due diligence prior to onboarding.

During the relationship lifecycle, we conduct supplier assurance on a cadence aligned to tiering, supplemented by contract controls, supplier scorecards and issue escalation processes. We also engage with internal stakeholders and global offices through periodic risk identification and compliance confirmation activities.

A summary of our progress during the reporting period ended 30 April 2026:

- We continue to screen our suppliers through Fusion and enhance visibility of potential risks, including modern slavery, associated with our suppliers. As part of our supplier assessment and onboarding process, we executed 623 Procurement Risk Questionnaires (PRQs) and 237 Supplier Assessment Questionnaires.
- We continue to review our approach to supplier relationship management and creating transparency when it comes to the minimum standards we expect from our suppliers, and explore ways that facilitate engagement with us through the automation of our processes and procedures.
- We continue to engage with the UN Global Compact UK Modern Slavery Working Group, taking part in quarterly workshops to better understand how modern slavery risks are evolving and how organisations in other sectors are tackling these risks. As part of our engagement with the Working Group, we also participated in a peer review exercise of our FY25 statement.

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Monitoring and evaluation

The metrics outlined below support our assessment of the effectiveness of our approach to preventing modern slavery in our business operations and supply chains.

On an annual basis, we review the sustainability performance of our key suppliers as part of our Sustainable Procurement Programme. The sustainability assessment undertaken by EcoVadis, who we partner with as part of this programme, includes, but is not limited to, labour, human rights and modern slavery. Any potential gaps will be flagged as 'high', 'medium' or 'low' by EcoVadis, allowing us to prioritise our follow-up due diligence and consultation with our suppliers to support corrective action.

During FY26, 94 Tier 1 and Tier 2 suppliers completed or maintained an EcoVadis assessment, with a further 26 assessments in progress for the reporting period ending 30 April 2026. The metrics below are based on information reported by suppliers through the EcoVadis platform, and the number of suppliers represented varies between indicators. We will continue to work with suppliers to support corrective action where gaps in their policies, processes and controls are identified.

KPIs related to strengths	FY26	FY25	FY24
		% of partners	
Actions to prevent discrimination and harassment in the workplace	97.4	96.5	90.7
Actions to remediate discrimination and harassment	92.1	78.0	73.2
At least standard reporting on labour and human rights issues	71.1	49.4	40.0
Collective bargaining agreement on preventing discrimination and harassment	18.9	10.1	8.7
Global Compact Signatory	50.0	47.6	47.9
Grievance mechanism or whistleblowing procedure in place	100.0	78.0	73.2
Grievance mechanism or whistleblowing procedure on labour and human rights issues	92.1	78.0	73.2
Measures on employee health and safety issues	97.4	97.6	96.0
Measures on working conditions	100.0	98.8	98.7

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Training and capacity building

Clifford Chance is committed to ensuring our people understand what modern slavery is, the circumstances in which it may occur, the key risk indicators, and how to raise concerns. Human rights and modern slavery training is mandatory for all colleagues and designed to enhance our ability to identify red flags and address risks. 96% of our people have completed this training since it was launched globally.

Through our policies and training, we seek to ensure that relevant decision-makers within core functions have the requisite level of knowledge and understanding of modern slavery risks that will enable them to identify issues and address them appropriately. Senior management's commitment to this issue reinforces the importance of effective implementation of our modern slavery policies throughout our operations.

Our SRM Learning Programme equips our contract owners and managers with the knowledge and skills they need to support the oversight and management of their suppliers, embed supplier management best practice, and support their compliance with our Global Procurement Policy and SRM Framework.

During the reporting period, we moved our current learning format to three e-learning modules. The modules equip individuals with the skills needed to identify, manage and monitor supply risks effectively, including modern slavery, and support ongoing management and oversight.

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Planning and priorities

We will continue to enhance our controls and procedures relating to third parties to identify, monitor and mitigate risk exposures and, where potential modern slavery risks are identified, to engage with suppliers to support appropriate remediation.

Our priorities for the next financial year include: (i) evaluating the effectiveness of procurement and supplier management enhancements; (ii) strengthening our understanding of extended supply chains beyond direct suppliers; and (iii) continuing to build internal capability through training and guidance.

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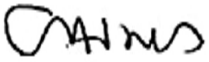
Governance, approval and sign-off

Governance, approval and sign-off

This statement is made by Clifford Chance LLP on behalf of itself and those entities which operate as part of the Clifford Chance Group and are subject to the governance of Clifford Chance LLP (including the Australian partnership, Clifford Chance, and its associated entities Clifford Chance Australia Pty Ltd, Clifford Chance Australia Services Pty Ltd (deregistered 3 December 2025) and Clifford Chance Australia Nominee Pty Ltd as trustee for Clifford Chance Services Trust) ("Clifford Chance").

This statement* was reviewed and approved by the Australian partnership, Clifford Chance, and its associated entities Clifford Chance Australia Pty Ltd, Clifford Chance Australia Services Pty Ltd (deregistered 3 December 2025) and Clifford Chance Australia Nominee Pty Ltd as trustee for Clifford Chance Services Trust.

Signed 

Charles Adams
Global Managing Partner, for and on behalf of Clifford Chance.
Date: 30 October 2026

*Consultation: This statement was prepared by the firm's central Compliance team with input from relevant stakeholders across the firm, in consultation with the Australian partnership, Clifford Chance, and its associated entities, including Clifford Chance Australia Pty Ltd, Clifford Chance Australia Services Pty Ltd (deregistered 3 December 2025) and Clifford Chance Australia Nominee Pty Ltd as trustee for Clifford Chance Services Trust.

Clifford Chance

This publication does not necessarily deal with every important topic or cover every aspect of the topics with which it deals. It is not designed to provide legal or other advice.

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*AS&H Clifford Chance, a joint venture entered into by Clifford Chance LLP.

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