

## Modern Slavery Statement 2024

Statement pursuant to S.54 of the Modern Slavery Act 2015 (UK) and S.14 of the Modern Slavery Act 2018 (Cth) (Aust)

This statement is made and published jointly on behalf of (1) Ashurst LLP, a limited liability partnership registered in England and Wales (2) Ashurst LLP's wholly-owned subsidiary, Ashurst Business Services Limited, (3) Ashurst Australia, a general partnership constituted under the laws of the Australian Capital Territory, and (4) Ashurst Australia Services Pty Limited in its capacity as trustee for the Travinto Services Trust, having its registered office in Victoria. References to "Ashurst", "we", "us", "our", or the "firm" are to these bodies, together with the related entities that carry on the Ashurst business around the world.

## Ashurst structure

Ashurst is a global law firm advising the world's largest companies, financial institutions and governments. The "Ashurst Group" comprises Ashurst LLP, Ashurst Australia and their respective affiliates which are authorised to use the name "Ashurst" or describe themselves as being in association with Ashurst.

Ashurst LLP is a limited liability partnership registered in England and Wales under number OC330252. It is a law firm authorised and regulated by the Solicitors Regulation Authority ("SRA") of England and Wales under number 468653 with the registered office being London Fruit & Wool Exchange, 1 Duval Square, London, E1 6PW, England.

Ashurst Australia (ABN 75 304 286 095) is a general partnership constituted under the laws of the Australian Capital Territory.

## Ashurst operations

We operate from 32 offices, across 20 countries and we employ over 4,000 employees. We provide clients with commercial legal advice across a broad range of industry sectors, including Banks and Private Capital, Digital Economy, Energy and Resources, Infrastructure, and Real Estate transactions.

We also offer a range of adjacent professional services (including Board Advisory, Risk Advisory and limited Trust and Company Services provision) in some jurisdictions.

We operate predominantly in countries that have been assessed by the Global Slavery Index as having both a lower prevalence of modern slavery and active government responses to dealing with such issues.

We wholeheartedly support the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Cth) (Aust).

## Ashurst people and training

Our people are our greatest asset. We foster an environment that is welcoming, inclusive and respectful of all backgrounds and perspectives.

We pay our employees at least the minimum wage in their local jurisdiction. We pay the UK Living Wage in Glasgow and the London Living Wage in London.

### Ashurst.com

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This material is current as at 5 April 2024 but does not take into account any developments to the law after that date. It is not intended to be a comprehensive review of all developments in the law and in practice, or to cover all aspects of those referred to, and does not constitute legal advice. The information provided is general in nature, and does not take into account and is not intended to apply to any specific issues or circumstances. Readers should take independent legal advice. No part of this publication may be reproduced by any process without prior written permission from Ashurst. While we use reasonable skill and care in the preparation of this material, we accept no liability for use of and reliance upon it by any person.

We provide a dedicated employee assistance programme that is a life management and personal support telephone service, available to our employees 24 hours a day. This confidential service supports our staff's mental, physical, social and financial wellbeing.

We require all Ashurst personnel to complete an e-learning course on modern slavery and workplace behaviours annually.

We regularly review our global recruitment procedures and providers, as well as our arrangements for employees' and contractors' welfare, championing mental and physical wellbeing.

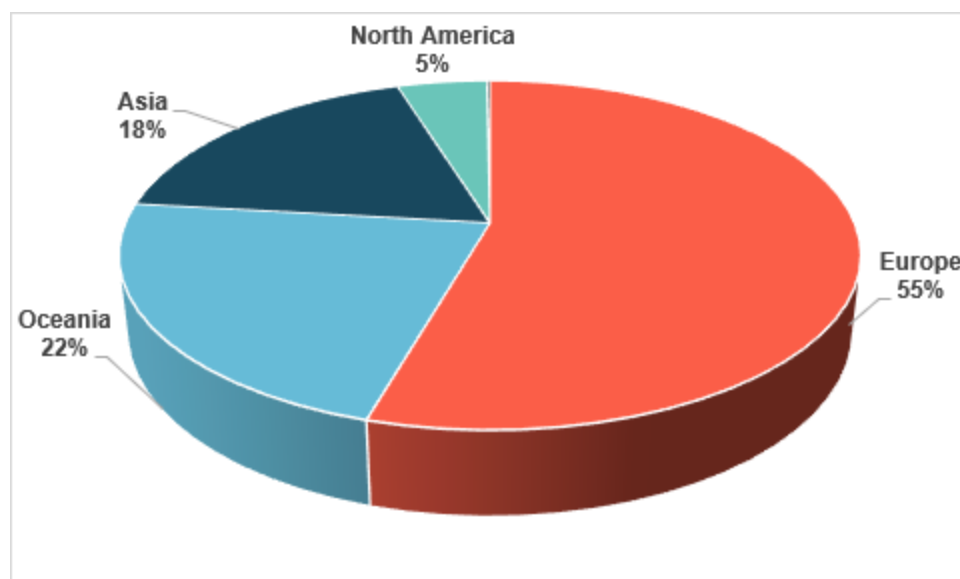
## Ashurst supply chain

We have a centralised Procurement Team based in Australia and the UK who are responsible for the procurement of goods and services and supplier contract management across the group.

Our supply chain consists primarily of low-risk professional support services or office facilities, which support our partners, lawyers and staff in their work. The key components they supply us with are:

- **Real Estate:** our offices that we work from.
- **Technology:** including IT hardware and software and print services that support our business.
- **Business Services:** the products we buy; for example furniture, stationery and marketing items, as well as the services we use, such as catering, security and cleaning.
- **Travel Services:** organising and booking travel and accommodation requirements.
- **Professional services:** including external training services, consultants, contractors and legal support services.

The chart below shows the percentages of our suppliers by location for financial year 2023-24. It shows that the majority of our suppliers are located in regions where Ashurst has an office. In regions where Ashurst does not have an office, our suppliers are limited to local counsel.



## Assessing the risk in our supply chain

Ashurst does not tolerate slavery or human trafficking or abusive treatment in any of our supply chains.

The firm is responsible for compliance with regulatory obligations where our work is carried out through others.

Ashurst operates an Enterprise Risk Management (ERM) approach, coordinated by the ERM Team, who work with subject matter experts and risk owners throughout the firm to ensure that risks are identified, recorded and responded to.

The Procurement Team are the risk owners for supply chain risk management. They are supported by subject matter experts within Ashurst's centralised Risk and Compliance Department, based in Australia and the UK. They work together to identify risks and ensure that our regulatory obligations and the firm's high standards are met, and our risks are appropriately managed.

We carry out thorough due diligence and ongoing monitoring on all major global suppliers in line with legal and regulatory requirements across our business. We utilise a third party risk assessment platform on which due diligence questionnaires, answers and supporting documentation can be exchanged between the supplier and Ashurst. This platform allows us to identify and score risk areas, including modern slavery and human trafficking. This enables us to monitor any remediation action by a supplier.

We operate in the legal sector, which is generally assessed as low risk for instances of modern slavery.

## Ashurst policies and procedures

Our policies make clear our approach to modern slavery and all forms of discriminatory or exploitative behaviour and treatment. Our key policies and procedures are set out below. They outline how we mitigate against the risks of modern slavery and are reviewed on a regular basis:

**Code of Conduct:** sets out the conduct that we expect of our personnel, contractors and suppliers. It also sets out that we conduct our business in accordance with international human rights principles. Our code of conduct states that we will not tolerate slavery or human trafficking or abusive or unfair treatment in any part of our own business, or in any of our supply chains.

**Global Procurement Policy and Guidelines:** establishes a global framework to ensure the firm is procuring goods and services in an ethical and sustainable way. The Policy sets out the firm's expectation that appropriate due diligence is carried out on an ongoing basis to ensure that slavery and human trafficking are not taking place in any of the firm's supply chains.

**Third Party Risk Management Manual:** sets out how all third parties to the firm are incepted through a global process of selection and thorough risk assessment to ensure the appropriate level of pre-engagement due diligence is performed on a risk-based approach and documented. The management of third parties supplying the firm follows monitoring principles: an annual

review and evaluation; rights to audit, when required by our risk-based approach; and a report made to the firm's Risk Committee for oversight.

**Global Anti-Money Laundering Policy:** covers our global obligations to ensure that we are not entering into or becoming concerned with an arrangement that facilitates the acquisition, retention, use or control of the proceeds of crime derived from criminal activity, such as modern slavery.

**Global Social Impact Policy:** sets out our commitment to working to make a social impact and supporting the communities in which we operate. It informs our Global Social Impact Programme, which works to increase access to opportunities for communities and individuals experiencing marginalisation and disadvantage, financial exclusion and/or hardship. Working to eradicate all forms of modern slavery through a committed Modern Slavery Action Plan and partnership with leading community organisations is one of our Global Social Impact Programme focus areas.

**Global Equal Opportunities Policy:** sets out our commitment to being an equal opportunities employer and to providing an inclusive working environment where everyone is treated with respect and dignity. The policy applies to current, potential or future personnel, consultants, contractors, agency workers and interns. All employees are required to comply with this policy, which also applies in all of the firm's professional dealings with third parties.

**Global Domestic and Family Violence Policy:** sets out the firm's commitment in supporting our employees who may be impacted or affected by domestic and family violence. The policy also sets out what support is available to staff members who are experiencing, impacted by or escaping domestic and family violence.

**Global Parental Leave Policy:** provides a globally consistent framework for parental leave entitlements across all of our offices. The policy sets out the financial and emotional support that we provide to members of our staff to support their economic resilience during parental leave.

**Global Whistleblowing Policy:** encourages everyone at Ashurst to disclose any illegal or unethical conduct that may be related to the firm or conduct that places the firm at risk. The policy is designed to ensure that individuals have a way of raising these concerns safely and in the knowledge that they will be treated seriously.

## Our actions in the past 12 months and looking ahead

Over the past 12 months, the following actions have been undertaken:

- **Global Rebrand and Ashurst-branded stationery, collateral and merchandise:** Ashurst rebranded in June 2023. We continue to enforce and build on supply chain visibility. Our merchandise is ethically and responsibly sourced, including through use of recycled plastics, 100% certified organic cotton and we support First Nations suppliers and designers as part of our Reconciliation Action Plan.

- **Engagement with AusLSA Modern Slavery working group:** We are continuing our engagement with the AusLSA Modern Slavery Co-Lab initiative. This is a group of Australian law firms that share information on modern slavery risks and collaborate on best practices in supply chain management.
- **Procurement Excellence Program:** Launched in November 2023, this initiative enhances our supplier relationship practices, increases transparency and aligns our risk management efforts with our corporate responsibility objectives. Through this programme, we have updated our global procurement policies and guidelines and refined our tender due diligence questionnaires; we have also developed firm-wide standards for certain high-risk products.

Over the next 12 months, we will be looking to undertake the following:

- **Supplier Diversity and Anti-Slavery Training:** Empowering our purchasers within the firm, we will be running Supplier Diversity, Supply Chain Sustainability and Anti-Slavery training over the next 12 months. Building on the existing e-learning courses the firm already mandates, this workshop will focus on awareness and processes to create more-diverse supply chains, with the aim of minimising our risk of exposure to modern slavery.
- **Implementation of a new end-to-end global vendor lifecycle management platform:** This will facilitate deeper insights and analysis into global spend patterns. This will allow us to implement more-targeted spend guidelines to further strengthen our commitment to responsible and sustainable spending.

## How we assess the effectiveness of our actions

In assessing the effectiveness of our actions, we undertake the following:

**Assessing the effectiveness of our training:** We assess completion rates of our compulsory modern slavery e-learning course and follow up with individuals, where necessary, to ensure compliance. During that past 12 months, 85% of our global staff have completed the training.

**Internal review of our policies and procedures:** We regularly review our policies and procedures to ensure they are in line with regulatory requirements and best practice. This also includes reviewing our due diligence and ongoing monitoring procedures in relation to our suppliers.

**Key Risk Indicators:** We measure supply chain management key risk indicators quarterly (and report on these to our Enterprise Risk Team). Some of these metrics allow us to monitor and maintain compliance with our supplier risk management programme and its effectiveness in meeting its key objectives.

**External scrutiny:** Our modern slavery policies and procedures also come under external scrutiny and are assessed by our clients through pitch processes, and periodically through audit assessments that set out to understand and verify our posture around modern slavery.

## External engagement

Ashurst's founder, William Henry Ashurst, was a progressive advocate who was deeply committed to social justice, particularly the abolition of slavery.

In recognition of the continued growth of modern slavery, we have expanded our existing pro bono work in this area into a global focus for the firm. This enables us to acknowledge our founder's legacy and commit to promoting and continuing that legacy on an issue that remains a massive threat today.

Through partnership with a range of charities, we provide pro bono support to not-for-profit organisations working to address and eradicate all forms of modern slavery. In some jurisdictions, we also provide pro bono legal advice to victims/survivors of modern slavery and human trafficking.

Our Social Impact teams run initiatives with charities in the modern slavery sector, including running workshops to raise awareness and mentoring support for victims of modern slavery and human trafficking. This support assists with English language, employment and IT training skills to help survivors build confidence and work towards independence.

## Communication

We publish copies of our Modern Slavery Statements on our global website and on the Australian and UK Modern Slavery Statement Registers.

## Consultation and board approval

This statement was prepared by Central Business Services Teams representing all of the entities noted below.

This statement was:

Approved by the boards of the relevant entities:

- **Ashurst LLP** on 11th July 2024
- **Ashurst Australia** on 11th July 2024
- **Ashurst Business Services** on 11th July 2024
- **Ashurst Australia Services, in its own capacity and as trustee for the Travinto Services Trust** on 11th July 2024

Approved by the members of Ashurst LLP on 7th August 2024

Signed by the Global Chair and Global CEO of Ashurst, being designated and responsible members and directors of each respective entity on their behalf

Signed:



**Karen Davies**

**Global Chair**

Signed:



**Paul Jenkins**

**Global CEO**