Charles Russell Speechlys

Modern Slavery Statement for our financial year ending 30 April 2023

The United Kingdom Modern Slavery Act 2015 ("**MSA**") requires certain businesses to provide disclosure concerning their efforts to ensure there is no modern slavery or human trafficking in their organisation or supply chain.

The following is the statutory statement by Charles Russell Speechlys LLP made pursuant to section 54 of the MSA and constitutes our slavery and human trafficking statement for the financial year ending 30 April 2023.

This statement is published on behalf of Charles Russell Speechlys LLP. In this statement, references to "we", "us", "our" or the "firm" are references to Charles Russell Speechlys LLP and each of its subsidiaries.

This statement has been approved by the Operational Committee of the firm.

Statement

We are committed to running our business responsibly and work hard to generate value for our people, our local communities and our society and to safeguard our natural environment.

We take seriously our legal and regulatory obligations in all our business conduct and strive to observe these fully in our recruitment policies, vendor selection and supply chain management. These include our duties under the MSA.

Background

Our business

We are an international law firm that provides advice to a range of UK and international clients across a number of different specialisms.

We have offices in London, Guildford and Cheltenham in the UK, and, outside the UK, in Hong Kong, Singapore, Paris, Luxembourg, Geneva, Zurich, Qatar, Dubai and Bahrain.

Our supply chain

Our supply chain comprises the types of supplier to be expected for a professional services firm of our size and scale.

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Our suppliers are primarily providers of professional services, premises and related facilities management services, utilities, catering services and IT equipment and related IT services.

Details of checks and due diligence conducted on members of the supply chain

We require suppliers to disclose information to us about their business practices, to assess whether there is a risk of modern slavery or human trafficking in their organisation or supply chain. Where requested, suppliers are required to disclose their anti-slavery policies and practices through part of an on-boarding process when they register through the firm's procurement portal. We are willing to terminate relationships with suppliers where they present an unacceptable risk in terms of their exposure to modern slavery or human trafficking risks.

We use a third-party risk intelligence tool to identify and monitor various risks including legal action related to modern slavery, human trafficking and bribery and corruption. This allows us to assess new suppliers and monitor existing suppliers on an on-going basis.

Our standard supplier contract terms require suppliers to confirm that they comply with their obligations under the Modern Slavery Act 2015.

We have not, to date, identified any instances or serious risks of modern slavery in connection with our direct suppliers, nor in our wider supply chain. We continue to monitor this on an ongoing basis.

In the past year we have conducted a review of suppliers in our highest risk locations to ensure they have appropriate processes and policies in place to reduce the risks of modern slavery within their own organisation and supply chain.

Employment

We are committed to the principle that those who work for us must have chosen their work freely and must be treated with dignity. We pay our UK staff the living wage. We also ensure that interns are paid fairly. We carry out due diligence on the practices of agencies who refer staff to us and they are subject to our Supplier Code of Conduct.

Training

We periodically make training on slavery and human trafficking available to staff. This is targeted primarily at our HR, procurement and facilities management teams

who are at the greatest risk of encountering modern slavery or human trafficking in their day-to-day functions.

The level of training provided is proportionate to the role of the employee concerned and the likelihood of their becoming exposed to instances of modern slavery or human trafficking in carrying out their everyday duties.

Violations

Violations by suppliers

We take very seriously any instance of suppliers being involved directly or indirectly in modern slavery or human trafficking. Our response to any such discovery will depend upon a number of factors, including the number of victims involved, the gravity of the human rights violations concerned, whether the supplier was involved directly or indirectly and whether or not the supplier has previously been involved in such conduct.

Violations by employees

We will not tolerate any of our Partners or employees being involved in modern slavery or human trafficking. Any such employee will be subject to serious disciplinary action in accordance with our employment manual and contract of employment.

Risk assessment

We have considered in detail the nature of our operations and supply chain. Given the nature of our business and the level of control we have over our operations, we consider that our material modern slavery risk exposure relates to our supply chain.

We carry out periodic assessments of our global supply chain by mapping the locations of our suppliers against the vulnerability score given by the Global Slavery Index. This assessment is used to assist prioritisation of risks with specific suppliers and supply chains. Together with location risk, we have identified the highest risk areas of our supply chain as being the purchase of goods and services in sectors where a large proportion of workers is paid the minimum wage. These include services relating to facilities management, travel and hospitality, as well as the purchase of products such as branded clothing and stationery.

We seek to mitigate any enhanced risks of modern slavery in our supply chain based on location and/or sector by:

- Conducting a procurement process for key contracts with suppliers;
- Placing an emphasis on value rather than price alone in our procurement decisions; and
- Ensuring staff involved in the procurement of goods and services and the management of suppliers receive appropriate training about risks relating to modern slavery and human trafficking.

Policies

We have a set of policies that clarify and communicate our approach to the identification of modern slavery risks and the steps that we take to prevent modern slavery and human trafficking in our operations and supply chain. These include:

- **Supplier Code of Conduct:** Our suppliers must adhere to our Supplier Code of Conduct which includes requirements on Modern Slavery, Child Labour and Physical Abuse risks.
- **Procurement Policy:** which details our approach towards procuring goods and services and ensures that our Procurement team has visibility over procurement activities.
- **Whistleblowing Policy:** which details the procedure for staff raising concerns about wrongdoing in the workplace and provides a framework for dealing with those concerns. Concerns may include issues relating to compliance with our policies, practices within the business or our supply chain.
- **Equal Opportunities and Diversity Policy:** which describes the diverse and inclusive culture that we strive to foster in our workplace - based on effective teamwork and mutual respect. It includes a commitment to fair terms of employment and guidance and procedures for dealing with bullying and harassment.

Effectiveness of policies

We keep our modern slavery and human trafficking policies and due diligence processes under regular review to ensure their effectiveness.

We review the following measures when assessing whether our policies and procedures are operating effectively:

- Whether we have received reports of suppliers being involved in modern slavery or human trafficking activity.
- Whether the assessment process has raised grounds for concern regarding modern slavery or human trafficking.
- Whether assessments have been completed on a significant proportion of our suppliers within the relevant financial year. We are currently working to increase this proportion.
- Whether relevant training has been delivered for all key procurement and supply management personnel.

Priorities for the year ahead

In the financial year ending 30 April 2024 we plan to:

- Continue to assess and monitor modern slavery risks in our own operations and within our supply chain.
- Provide further training on modern slavery and human trafficking to our Partners and employees as necessary and proportionate.
- Continue to conduct additional due diligence on those suppliers in locations with a heightened risk of modern slavery.



SIGNED by SIMON RIDPATH for and on behalf of CHARLES RUSSELL SPEECHLYS LLP