

ALLEN & OVERY

Slavery and Human Trafficking Statement 2018/19

31 October 2019

Purpose of this statement

This statement is made on behalf of Allen & Overy LLP, its wholly owned subsidiaries, Allen & Overy Service Company Ltd (together, the **Firm**) pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**) (the **Statement**).

The Statement was approved by the Board of Allen & Overy LLP on behalf of the Firm on **16 October 2019**. It was reviewed and approved by each of the individual entities comprising the Firm which has obligations under the Act.

Introduction

The Firm takes its obligations in relation to the identification, reporting and prevention of slavery and human trafficking very seriously and has a zero tolerance approach to all abuses of human rights. As a responsible business, the Firm is committed to taking appropriate steps to ensure that slavery and human trafficking does not occur within and part of its own business or any of its supply chains. The Firm is committed to upholding and promoting human rights through the way the Firm conducts its business, including its programme of charitable and pro bono work that supports many human rights initiatives.

Overview of business activities

The Firm is one of the world's leading international legal practices providing legal services across a number of sectors and legal expertise within a culture built on a philosophy of continual improvement to meet its clients' changing needs. The Firm's expanding network of 43 offices in 30 countries spans Europe, Asia Pacific, the Middle East, North America, Central and South America and Africa. The Firm's full-service capabilities are delivered by approximately 5,500 people, including some 550 partners worldwide who work in a highly integrated manner across the Firm's office network.

The Firm's supply chain

As a law firm, the Firm has a relatively simple supply chain model that is built around supporting its core legal practice and maintaining its global office and technology infrastructure. The types of goods and services necessary to do so fall into five broad categories:

- **Business services:** the diverse range of products and services the Firm buys to ensure it can maintain normal day-to-day operations in its offices and support its core legal practice, such as catering, security, library services, and print and document services;
- **Professional services:** the professional services the Firm buys such as external training, audit services and advisory services in areas such as tax, regulation and insurance;
- **Real estate:** the office space the Firm buys or leases to accommodate its people and operate its business;
- **Technology:** the systems, software and equipment that are necessary to maintain its global technology infrastructure that supports the Firm's legal practice; and
- **Travel:** as an international law firm, global mobility is essential and the Firm works with a large number of travel providers such as hotels and airlines.

The Firm has a central procurement function that manages the procurement of high value and/or high risk goods and services in accordance with the Firm's procurement policy and formal tendering procedures. More information about how the Firm procures goods and services, and screens new suppliers is contained in the section below titled *Risk assessment of the Firm's supply chain and due diligence procedures*.

Relevant policies

The Firm has a number of existing policies and procedures which are relevant for mitigating the risk of slavery or human trafficking occurring in the Firm's business or any of its supply chains. In particular, the following Firm policies are directly relevant to the issues discussed in this Statement:

- **Procurement policy:** this policy includes specific procedures relating to how slavery and human trafficking risks are identified and assessed through the Firm's procurement processes.
- **Supplier code of conduct:** the code of conduct sets out the standards the Firm expects its suppliers to observe, including provisions that specifically prevent the use of compulsory and involuntary labour. The code of conduct also provides the Firm's suppliers and their workers with a mechanism to report suspected breaches of the code or other abuses to the Firm for investigation.
- **Authority limits and contract signing policy:** this policy sets out the Firm's internal control and governance procedures with regard to approving financial transactions and signing contracts with suppliers. The policy ensures that contracts cannot be entered into without an appropriate level of review and authorisation by a suitably senior and qualified member of staff.
- **Health and safety policy:** this policy sets out the Firm's commitment and approach to ensuring it provides a healthy working environment for its own staff and contractors that work onsite.
- **Dignity at work policy:** this policy sets out the Firm's approach to preventing the occurrence of discrimination, harassment, bullying or victimisation in the work place.

The Firm also provides its employees with access to an employee assistance programme (provided by an independent third party company) that can be used by its employees for free and confidential advice in relation to workplace concerns or issues.

Risk assessment of the Firm's supply chain and due diligence procedures

The Firm's procurement policy requires that all new suppliers are subject to an appropriate level of risk assessment and screening. The scope of the risk assessment and screening the Firm performs depends on the nature of the goods or services being procured, but can include:

- financial checks;
- data security assessments;
- reference checks;
- obtaining copies of relevant documents;
- corporate responsibility checks;
- site inspections/audits; and/or
- modern slavery risk assessments.

To determine whether a modern slavery risk assessment is required, the Firm employs an analytical method that takes into account various risk factors (including country, sector and impact risk) to give an overall indication of potential risk with a given supplier. Suppliers are then allocated a risk score which determines the extent of further diligence required. Higher risk suppliers are required to complete a modern slavery questionnaire which is used by the Firm to evaluate the adequacy of a supplier's current anti-modern slavery policies and controls. Where appropriate, the assessment may also include a site audit and development of an action plan to address any identified gaps.

Suppliers are also contractually required to adhere to the Firm's [supplier code of conduct](#) (the code of conduct explicitly forbids the use of forced labour and other forms of human rights abuses). In addition to this, the Firm includes specific anti-slavery and human trafficking contractual clauses in contracts for goods and services that are categorised as of higher risk.

Evaluating the Firm's performance

The Firm monitors and reviews the following indicators of relevance to its effectiveness at combating slavery and human trafficking in the Firm's business and supply chains:

- The number of modern slavery risk assessments carried out in relation to medium to high risk suppliers;
- Supplier audit results;
- Formal scorecard reporting on the performance of its key suppliers, including compliance and risk matters; and
- The number of staff provided with modern slavery training, including those completing our recently launched modern slavery e-learning module.

Training in relation to modern slavery and human trafficking

The Firm has launched a modern slavery e-learning module that seeks to:

- Raise awareness about modern slavery and the various forms it can take;
- Teach staff and partners to recognise the red flags that may indicate modern slavery;
- Understand what to do if a case of modern slavery or human trafficking is suspected within the supply chain; and
- Learn about the laws associated with modern slavery and Firm's policies in relation to preventing the occurrence of Modern Slavery within the supply chain.

The modern slavery e-learning module was launched in early 2019 and has been rolled out globally to all staff and partners across the Firm.

The Firm has also delivers more targeted training for the teams and individuals within the business that have direct responsibility for procuring goods and services and managing suppliers. The training is focused on raising awareness of the Firm's specific procedures for identifying and appropriately screening higher risk suppliers.

The Firm's broader contribution to human rights initiatives

One of the Firm's major global Pro Bono and Community Investment initiatives is our Human Rights Working Group, which brings together more than 200 lawyers and partners who are passionate about using their expertise on human rights work. We provide pro bono support to human rights charities and international non-governmental organisations, such as Fair Trials International, Redress, the AIRE Centre, the Vance Center, The Center for Reproductive Rights, Justice Without Borders and Minority Rights Group, in the delivery of their work. This support might take the form of representing marginalised communities in court, submitting *amicus curiae* briefs and undertaking international comparative research projects to inform policy work. In some countries, we provide pro bono representation to individuals who have suffered breaches of their human rights.

The Firm's Human Rights Working Group delivers training for (and with) our clients on human rights compliance. We advise commercial clients on their human rights policies, particularly in light of the adoption by the UN Human Rights Council of the Guiding Principles on Business and Human Rights, and the applicability to their business of instruments such as the European Convention on Human Rights and the Charter of Fundamental Rights. We regularly attend the UN Forum on Business and Human Rights and in November 2017 convened a panel on access to remedy for migrant workers. We also publish *The Business and Human Rights Review*, an interdisciplinary journal that brings together academia, business, NGOs and multilateral bodies to debate issues pertaining to the relationship between business and human rights.



Wim Dejonghe
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31 October 2019



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31 October 2019