

Slavery and Human Trafficking Statement 2015/16

31 October 2016

Purpose of this statement

This statement is made on behalf of Allen & Overy LLP, its wholly owned subsidiaries and 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 14 October 2016. 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 any 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 44 offices in 31 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 5,200 people, including some 530 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 cleaning, 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 to 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 & 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 as well as appropriate processes for reporting concerns within the Firm.

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
- slavery and human trafficking assessments.

To determine whether a slavery and human trafficking 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 factor which determines the extent of further diligence required.

If the risk score for a supplier is medium or higher, then the Firm's procurement policy requires that a slavery and human trafficking risk assessment is undertaken in relation to the supplier. The purpose of the assessment is to satisfy the Firm that the supplier in question has adequate policy and procedural safeguards in place. Such an assessment includes questionnaires, requests for information and evidence about their policies and procedures in relation to the prevention of slavery and human trafficking and may, if necessary, be followed up with a site audit and/or the requesting of further information until such time as the Firm is satisfied the supplier has demonstrated it has appropriate policy and procedural safeguards in place.

The slavery risk assessment was introduced in the 2015/2016 financial year and is accordingly, in the process of being completed for the Firm's existing supply chain. It is the intention that the Firm repeats the risk scoring and assessment process annually, assessing and controlling risk from both new suppliers and existing suppliers

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 slavery and human trafficking 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
- number of staff provided with slavery and human trafficking training.

Training in relation to slavery and human trafficking

The Firm has delivered a programme of slavery and human trafficking awareness training to its procurement team and the individuals in its business with responsibility for managing suppliers in medium to high risk areas.

The purpose of the training has been to raise awareness of slavery and human trafficking as a problem that could potentially affect the Firm's supply chain, provide assistance in identifying medium and high risk suppliers and behaviours, and provide for detailed understanding of the Firm's procedures in relation to medium and high 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 JUSTICE, Bail for Immigration Detainees, Minority Rights Group International and the International Refugee Assistance Program, 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.

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 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. The fourth edition has a focus on slavery.



Wim Dejonghe

Designated Member, on behalf of **Allen & Overy LLP**

24 October 2016



Wim Dejonghe

Director, on behalf of **Allen & Overy Service Company Ltd**

24 October 2016