

Modern Slavery and Human Trafficking Statement

This statement is published on behalf of Hogan Lovells International LLP and Hogan Lovells Services pursuant to section 54 of the Modern Slavery Act 2015. It constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2016.

Introduction From Chair and Chief Executive Officer

Hogan Lovells is committed to doing business responsibly. Driving professional and business ethics, accountability, and responsibility is very much part of who we are and how we behave. As one of the world's leading law firms, with operations in 24 countries across six continents, we have a responsibility to uphold and champion the rule of law and its underlying principles. We support the UK Government's objective of eradicating modern slavery and human trafficking in all its forms. We are committed to taking steps to ensure that human rights abuses, however they may arise, are recognised and eradicated in our business and supply chains.

Nicholas Cheffings Chair, Hogan Lovells

Stephen Immelt *CEO, Hogan Lovells*

For the purposes of this statement, the term 'modern slavery' encapsulates slavery, servitude, forced or compulsory labour and human trafficking.

Our Business, Organisational Structure and Supply Chains

Hogan Lovells International LLP and Hogan Lovells Services are part of Hogan Lovells, an international legal practice that works with corporations, financial institutions, governments, and social enterprises across the spectrum of their business and legal issues both globally and locally. We have in excess of 6,000 people working from 45 offices in Africa, Asia, Europe, Latin America, the Middle East, and the United States. For further information about our organisation, please see <u>About Us</u>.

Our business is office-based and our primary supply chain categories support these operations. Categories include office space, office services (including the provision of security, catering office supplies and cleaning), IT and technology, professional services, and business travel. There are more than 1,000 first tier (i.e. direct) suppliers in our supply chain.

Policies and Commitments

Hogan Lovells is committed to the highest ethical standards in the conduct of its business worldwide and we expect our suppliers to uphold the same values. We will not tolerate modern slavery in our business or supply chains and take effective steps to meet this commitment.

We are signatories to the <u>UN Global Compact</u> and produce an annual <u>Communication on Progress</u> setting out how its principles are integrated across our organisation, including principles one ('the protection of internationally proclaimed human rights') and four ('the elimination of all forms of forced and compulsory labour').

In addition to being signatories to UN Global Compact, we have endorsed the <u>UN Guiding Principles on</u> <u>Business and Human Rights</u> (UNGPs). We respect human rights and implement that through our management policies and processes and by providing education and training for our people. We also support the <u>Sustainable Development Goals</u>.

We sit on the Advisory Panel to the UK's <u>Anti-Slavery</u> <u>Commissioner</u> and perform voluntary legal work in support of their aims. We also have a partnership with London's Metropolitan Police to support victims of forced prostitution and labour, and have recovered substantial compensation for victims.

We are voluntary signatories to <u>London Living Wage</u> (LLW). This campaign provides a benchmark for employers who choose to pay their employees at a rate which is calculated according to the cost of living. We pay our employees at a rate higher than the LLW, but we also require our contract staff providers, such as caterers, to pay their own employees the LLW rate as a minimum.

Modern Slavery Risks and Steps to Eliminate

We have a dedicated core group addressing risks in the area of modern slavery and ensuring that appropriate measures are applied to assess, manage and minimise risk. This group comprises representatives from compliance, procurement, HR, citizenship, and our human rights practice. It is comprised of lawyers and senior managers.

As a regulated provider of legal services and employer of predominantly professionally qualified and highly skilled people, the risk of modern slavery and human trafficking existing within our business is considered low. We apply robust policies and procedures concerning employment screening (including work eligibility checks) and employment conditions (including our LLW commitments) in place.

The majority of our suppliers are UK-based and supply standard goods or services. We do not simply buy goods or services on cost based principles. We recognise there are areas of potentially higher risk and some services involving relatively high levels of contracted labour. We have a database of our first tier suppliers to maximise control and coordination, adopting a risk-based approach to assess and manage, whenever necessary, any modern slavery risks in our supply chain.

Suppliers are risk assessed and categorised taking into account the nature of their business as well as country of operation, and product and industry characteristics. We use the <u>Global Slavery Index</u> and other similar resources to determine the inherent ris' associated with specific jurisdictions and sectors. An suppliers categorised as presenting an appreciable risk of failing to meet our standards are required to complete a modern slavery questionnaire. The qualit and transparency of responses to these questionnaires is assessed and acted upon.

We have developed a Supplier Code of Conduct which applies to our providers of goods and services and sets out the standards we expect them to observe. Where our standards are not met, suppliers will be expected to take and evidence remedial steps to ensure their activities in our supply chain are free from modern slavery, considering what approach will result in the safest outcome for potential victims and enhance supplier behaviour.

Education and Training

We have developed training and information forums to provide the skill and knowledge to those staff responsible for procurement to recognise the key issues and risks and how these must be addressed. This will evolve into an online education module available to all staff regardless of their role. We are committed to promoting and maximising awareness of modern slavery risks across our organisation.

Next Steps

We will continue to review and develop policies and supplier processes across our business as best practice matures to ensure a robust and consistent approach to supply chain risks. We will continue to make all efforts to identify any significant risks in our supply chain and implement any actions appropriate or necessary directly with suppliers.

We will review by an audit programme the effectiveness of the measures we take in promoting our drive that there are no modern slavery or human trafficking abuses in our supply chains.

Board Approval

This statement has been approved by the board of Hogan Lovells International LLP and by the board of directors of Hogan Lovells Services.

Nicholas Cheffings, Designated Member, on behalf of Hogan Lovells International LLP

20 June 2017

Nicholas Cheffings, Director, on behalf of Hogan Lovells Services

20 June 2017

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