

Modern Slavery and Human Trafficking Statement – October 2021

Squire Patton Boggs (UK) LLP

1. This statement is prepared for the purposes of Section 54(1) of the Modern Slavery Act 2015 and forms our slavery and human trafficking statement for the financial year ending 30 April 2021.

Our business

2. We are part of an international legal practice trading as “Squire Patton Boggs”, the practising components of which are separate and distinct law firms and other entities. We and Squire Patton Boggs (US) LLP are the only members of Squire Patton Boggs International Association (a Swiss Verein); the Verein does not itself provide directly or indirectly any legal or other client services. They are provided solely by us, Squire Patton Boggs (US) LLP and our respective subsidiary and affiliated entities. This statement is made in respect of our business only.
3. Squire Patton Boggs (UK) LLP is a Limited Liability Partnership registered in England and Wales. A list of our members and their professional qualifications is open to inspection at Premier Place, 2 & A Half Devonshire Square, London EC2M 4UJ. We have places of business in the UK plus France, Spain, Belgium, Italy and Australia.
4. Our affiliated undertakings comprise Squire Patton Boggs (AU) GP, a partnership organised under the laws of Australia whose principal office is at Level 17, Aurora Place, 88 Phillip Street, Sydney NSW 2000, Australia; Haussmann Associés SELARL, registered in France; Devonshire Trustees Limited, Edge Ellison Services, Farringdon Management Company, Squire Patton Boggs Secretarial Services Limited, The Trustee Corporation Limited and the Thousandth Man - Richard Burns Charitable Trust, each registered in England and Wales with its registered office at Rutland House, 148 Edmund Street, Birmingham, B3 2JR; Hammond Suddards Trustees Limited registered in England and Wales with its registered office at 6 Wellington Place, Leeds, LS1 4AP; Devonshire Promotions Limited, Squire Patton Boggs Directors Limited, Squire Patton Boggs Secretaries Limited and Squire Patton Boggs Park Lane Limited, each of which is registered in England and Wales with its registered office at Premier Place, 2 & A Half Devonshire Square, London EC2M 4UJ; and Trinity Park Trustees Limited, registered in England and Wales with its registered office at No. 1 Spinningfields, 1 Hardman Square, Manchester M3 3EB.
5. Our business is the provision of commercial law advice to clients around the world. We are authorised and regulated in the conduct of our affairs, by the Solicitors Regulation Authority (“**SRA**”) of England and Wales. The SRA Standards and Regulations which govern our behaviour include fundamental Principles that we must act to uphold the rule of law and the proper administration of justice in a way that maintains public trust and confidence in the legal profession; in a way that encourages equality, diversity and inclusion; and with honesty and integrity. Similar obligations govern the conduct of our business in our other jurisdictions.

Our principles

- 6 We aim at all times to carry out our business wherever it is effected in full compliance with local law and best practice. That includes, but is in no sense limited to, proper respect for: (a) the SRA Principles referred to above (and their local law equivalents in

the governing jurisdictions of our operations and associated entities overseas); and (b) the issue of human rights and specifically the importance for us, our clients and the broader global society of combating abuses of them, whether through human trafficking, slavery, child labour or otherwise.

Our services

- 7 As a professional services organisation, we consider the risk of modern slavery within our business to be very low. As a result, we do not maintain separate policies in relation to those matters, nor provide specific training on them to the majority of our staff (though such training is from time to time provided to our HR, Procurement and senior management teams). We do have existing policies and procedures relating to grievances, ethics, fraud and corruption, disciplinary issues and whistleblowing which we are confident are sufficient to allow and encourage any LLP Member, employee, supplier or agency worker with relevant information about modern slavery or human trafficking to come forward without fear of retaliation and also to allow the firm to take any necessary corrective action immediately. No suggestion has been made to us that this is not the case. No reference to any concerns about modern slavery or human trafficking have been made in any exit interview in the year under review.

Our supply chain

- 8 Our "supply chain" in relation to the provision of professional services, consists in the main of other regulated and trusted professional services – banks, intermediaries, accountancy and insolvency practitioners, surveyors, medical advisors, other law firms, barristers, expert witnesses, private investigators, etc. Many are used only on an occasional or one-off basis and we expect that where they are UK-based many will have their own direct obligations under the Modern Slavery Act and/or their own regulatory oversight regime in any event. At no time before or during the year to April 2021 have we had any reason to suspect the existence of exploitative practices (slavery, child labour or trafficking) in any of those businesses. The same is true in relation to our business in Australia. Consequently, we believe these providers to be very low risk so far as issues with trafficking and modern slavery are concerned, and so we do not at this stage take or propose to take any specific action in relation to these professional services relationships beyond our normal supplier approval processes. If our experience or perception of the extent of that risk changes then this position will be revisited.
- 9 We do not generally supply goods except as ancillary to the provision of professional services (e.g., binders for the provision of bundles of documents, or a limited range of branded items for promotional purposes). To the very limited extent to which we are supplied with goods ourselves, the great bulk will therefore be ordinary office consumables and promotional items. We obtain these items from substantial, established and reputable office suppliers, not direct from any manufacturer, whether in the UK or overseas. The same is true in respect of such goods acquired for use in the overseas offices. Those suppliers will all have their own direct obligations under the UK Modern Slavery Act or overseas equivalent in relation to their supply chain. As a result, we do not consider there to be a material risk of slavery in any business relationship concerning the supply of goods to us over which we have any direct control (but nonetheless see paragraphs 11 and 12 below).

- 10 We also receive services in relation to our own operations through the use of external contractors to provide our cleaning, catering, maintenance, mail room, photocopying, security, transport, hotel/travel booking and reception services.
- 11 We consider that the supply of internal (non-professional) services and of goods may (being for the most part not professionally regulated and/or sourced from countries with less well developed legal protections against exploitation) carry a marginally greater risk of slavery or human trafficking than the supply of professional services. Therefore, we have developed certain minimum conditions to be included where practicable in our relations with approved suppliers of such goods and services. To be "approved", the firm generally requires a prospective supplier to provide certain information and undertakings about its supply chain and other business practices. The nature and extent of the information requested from each supplier is proportionate to the perceived risk, having regard to factors including the volume, frequency and value of goods and/or services to be supplied, any unusual time or costs pressures to be imposed by us, the nature of the goods or services and their geographical origin, the supplier's market reputation and the history of our prior dealings with it, if any. We check its website to verify its own compliance with the terms of Section 54(1) of the UK's MSA 2015.
- 12 We use this information to assess the extent of any risk of slavery, child labour or human trafficking in that supplier's (and hence our own) supply chain. As matters stand as at the date of this statement, these processes have not given us any reason to suspect the existence of child labour, modern slavery or human trafficking issues in this part of our supply chain. Compliance with these terms and the absence of any grounds for suspicion on our part of such issues are pre-conditions for any supplier's tender being taken forward through our procurement processes.

Supplier requirements

- 13 The conditions to being an approved supplier referred to in paragraph 11 apply both on the renewal of existing contracts and on entering new supply relationships. Those terms include a written requirement that the supplier shall (or will take reasonable steps to procure that its own suppliers shall):
- (i) take reasonable measures to protect the health and safety of its workforce and workers in its own supply chain;
 - (ii) not use or permit to be used any slavery or child labour in the fulfilment of any supply of goods or services to us;
 - (iii) comply with local law requirements as to physical working conditions, maximum working hours and minimum pay and rest breaks, etc., and with the other workforce rights applicable under the law and best practice of the relevant country;
 - (iv) both contractually and actually allow its workforce freedom to leave their employment without the unlawful withholding of money or identity papers to deter or prevent this;
 - (v) take reasonable steps to prevent the unlawful treatment of its workforce by internal management or third parties;

- (vi) not engage in bribery or similar unethical practices;
- (vii) be able and willing to confirm to us on our request the steps which have been taken by it to comply with these requirements and the Modern Slavery Act as a whole;
- (viii) where appropriate, work with us to address any areas where there is perceived to be an unusually high risk of modern slavery or human trafficking, and to take steps to implement remedial action where such issues have actually been identified in their businesses or supply chains, understanding always that if we cannot satisfy ourselves that reasonable steps to tackle those risks or specific instances of modern slavery have been taken, it may be necessary for us to sever (or not enter into or renew) any contract with that supplier; and
- (ix) we expect our suppliers to continually engage with us constructively and responsibly, and to demonstrate their willingness and ongoing commitment to remedy modern slavery risks and issues in a timely way.

14 Although we are confident that the issue has never so far arisen in practice, we are aware of the need to avoid imposing demands on our suppliers which, by reason of their size or urgency or pricing or timing of payment of their bills may force or encourage those suppliers to resort to slavery or trafficked labour to meet them.

Corporate responsibility

15 Responsibility for Squire Patton Boggs (UK) LLP's compliance with the Modern Slavery Act lies on an operational basis with the firm's Ethics and Compliance partners and General Counsel and its HR and procurement teams, and managerially with the senior management of the UK LLP. This statement is issued with the consent of the Managing Partner and the Office Managing Partners for all the UK LLP's offices in the UK and overseas, those individuals being also entitled to speak for and commit each of the other associated entities referred to at paragraph 4 above.



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Jonathan Jones, Managing Partner
Squire Patton Boggs (UK) LLP

October 2021