

Modern Slavery and Human Trafficking Statement – October 2019

- 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 2019. It takes into account the revised Government Guidance on supply chain transparency issued in October 2017.

Our business

- 2 Squire Patton Boggs is the collective trade name for our international legal practice, the practising components of which are separate and distinct law firms and other entities. Squire Patton Boggs International Association (a Swiss Verein) does not itself provide directly or indirectly any legal or other client services. Such services are provided solely by its members, Squire Patton Boggs (US) LLP and Squire Patton Boggs (UK) LLP and their respective subsidiary and affiliated entities. No individual who is a member of or partner in any Squire Patton Boggs LLP is a member of or partner in any other LLP, and neither any such individual nor any such entity has any authority to commit or otherwise bind any other such entity in any manner. As a result, this statement is made in respect of the business of the UK LLP only. Unless stated otherwise, references in this statement to "we" or "SPB" or "Squire Patton Boggs" etc., shall be to the UK LLP and its affiliated undertakings only, and not to the US LLP. As from 1 May 2019 Squire Patton Boggs (AU) GP became an affiliated entity of the UK LLP (and its partners are now also Members of the UK LLP).
- 3 Squire Patton Boggs (UK) LLP is a Limited Liability Partnership registered in England and Wales. A list of the members and their professional qualifications is open to inspection at 7 Devonshire Square, London EC2M 4YH. It has places of business in the UK plus France, Spain, Belgium and Australia.
- 4 The UK LLP and its affiliated undertakings comprise Squire Patton Boggs (UK) LLP; 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; Hausmann 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 7 Devonshire Square, London, EC2M 4YH; and Trinity Park Trustees Limited, registered in England and Wales with its registered office at Trinity Court, 16 John Dalton Street, Manchester, M60 8HS.
- 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, both as a business and as professional individuals, by the Solicitors Regulation Authority. Relevant among the SRA's 10 mandatory Principles are requirements that we must: (1) uphold the rule of law and the proper administration of justice; (2) act with integrity; (6) behave in a way that maintains the trust the public places in us and in the provision of legal services; (7) comply with our legal and regulatory obligations; and (8) run our

business effectively and in accordance with proper governance and sound risk management principles. Equivalent provisions 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.
- 7 The accession of the AU GP to the UK LLP brings into relevance the requirements of Australian legislation in this area, specifically the Modern Slavery Act 2018 (Cth). The Act does not strictly apply to our business in Australia as it falls below the A\$100m turnover threshold but as it allows for voluntary reporting it is nonetheless our intention to comply with its key principles, including as to the publication of an annual statement. As the requirements of that Act in relation to statements are substantially the same as those of the UK Modern Slavery Act, this statement should be treated as made also in respect of the Australian business. We are also monitoring the progress of proposed anti-slavery legislation in NSW.

Our services

- 8 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. In addition, notice boards on all floors in our UK offices now contain at least one notice referring to the identification and reporting of possible modern slavery obtained from www.modernslavery.co.uk and/or the relevant local police force, and providing details of the reporting helpline should any employee be concerned by the prospect of reporting internally.

Our supply chain

- 9 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

2019 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 both before and since its integration into the UK LLP. 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.

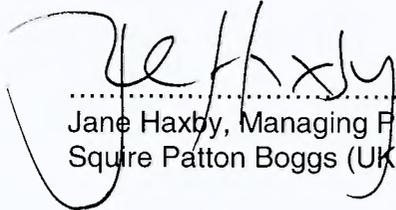
- 10 We do not generally supply goods except as ancillary to the provision of professional services (e.g. binders for the provision of bundles of documents, or a limited range of branded items for promotional purposes). To the very limited extent to which we are supplied with goods ourselves, the great 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 Australian offices. Those suppliers will all have their own direct obligations under the UK Modern Slavery Act or Australian 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 12 and 13 below).
- 11 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.
- 12 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 will be 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 and (in Australia) the MSA 2018 (Cth).
- 13 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

- 14 The conditions to being an approved supplier referred to in paragraph 12 will 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.
- 15 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

- 16 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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Jane Haxby, Managing Partner
Squire Patton Boggs (UK) LLP

October 2019