

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Policy Status

1. This document contains the firm's policy relating to Anti-Slavery and Human Trafficking.
 2. The policy was approved by the Operations Board on 14 September 2016 and updated by the Risk and Compliance team in February 2023.
 3. Any questions about the application of this policy should be directed to the Human Resources team in the first instance.
 4. The details of this policy have been logged on the firm's Policy Log (Doc ID 4124-7317-6115)
 5. Future changes to this policy should be published on the intranet and notified at staff updates.
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1 INTRODUCTION

This policy sets out Lewis Silkin LLP's policy on combatting forced labour in our business and our supply chain. The term forced labour used in this policy includes slavery, servitude, any type of forced and compulsory labour and trafficking for the purposes of exploitation. This policy applies to all those who work for us or on our behalf, including agency workers, casual and freelance staff, sub-contractors, suppliers and business partners, as well as employees.

We oppose the use of forced labour and we expect all those who work for us and on our behalf to share our zero-tolerance approach. We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery through our supply chains. We expect the same standards from all of our suppliers and expect them to hold their own suppliers to the same high standards.

2 WHY COMBATING FORCED LABOUR MATTERS

Forced labour is a global problem. It affects over 20 million people around the world. Taking steps to tackle forced labour protects vulnerable workers and helps prevent human rights violations.

We do not tolerate forced labour within our business. Eradicating forced labour is consistent with our ethical principles and is important to protect our reputation, sustain investor and consumer confidence and secure our commercial position.

3 OUR RESPONSIBILITIES

The Operations Board is responsible overall for ensuring that this policy and our annual slavery and human trafficking statement (see below) complies with our legal and ethical duties.

The Co-Chief Operating Officers have day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, answering queries on it and auditing internal processes aimed at ensuring that forced labour is not taking place in our business or our supply chains. The Joint Managing Partners are responsible for approving the annual statement.

The Modern Slavery Act 2015 requires commercial organisations over a certain size to publish a slavery and human trafficking statement each financial year, disclosing the steps an organisation has taken to ensure that there is no slavery or human trafficking in its supply chain or its business. Our statement is published on the home page of our website and should be read in conjunction with this policy and the Supplier Code of Conduct.

4 WHAT WE ARE DOING

We take the following steps to verify, evaluate and address the risk of forced labour in our supply chain:

- (a) We set clear expectations for our suppliers including through our Supplier Code of Conduct.

- (b) We request our suppliers to implement the principles in this policy and in turn hold their own supply chain accountable to these expectations.
- (c) At the point of onboarding, new suppliers are expected to respond to a compliance questionnaire which raises a number of questions in regard to modern slavery which includes asking them to confirm compliance with the Modern Slavery Act 2015; whether they conduct supply chain due diligence and whether any incidents of modern slavery or human trafficking have been identified in their operations.
- (d) Where appropriate we include contractual clauses in our supplier contracts requiring suppliers to confirm that they have not in the past and will not during the term of the contract act in breach of modern slavery regulations including the Modern Slavery Act 2015.
- (e) We reserve the right to terminate our relationship with a supplier if issues of non-compliance with our policy are discovered.

5 EMPLOYEE RESPONSIBILITIES

Managers are responsible for ensuring that this policy is applied within their own area.

Our employees are expected to be alert to any indicators of forced labour and to report any instances of forced labour in our business or supply chain.

We do not tolerate any forced labour within our business. If you suspect that there has been a breach of this policy or if you have any concerns regarding the issue of forced labour in any part of our business or our supply chain, you should notify your manager as soon as possible.

6 SUPPLIER RESPONSIBILITIES

We request all of our suppliers to implement the principles in this policy and in our Supplier Code of Conduct. Where it comes to our attention that our suppliers fall short of the requirements set out therein we reserve the right to terminate our contract with them.

7 MONITORING OUR EFFECTIVENESS

We will regularly review this policy to ensure that it is operating effectively. Where concerns have been raised through this policy, we will consider how they have been handled and if appropriate follow up action has been taken.

8 SCOPE AND APPLICATION OF THIS POLICY

This policy applies to all those who work for us or on our behalf, including agency workers, casual and freelance staff, suppliers and business partners, as well as employees.

Aspects of this policy may need to be applied in different ways to cater for those who are not employees.

This policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended by us at any time.