Slavery and Human Trafficking Statement 2017

Fieldfisher LLP

1. Financial year

1.1 This slavery and human trafficking statement relates to Fieldfisher's financial year beginning 1 May 2016 and ending 30 April 2017.

2. Introduction

2.1 This statement sets out the steps that we have taken during our 2016-2017 financial year to ensure that slavery and human trafficking is not taking place in our own business or in any parts of our supply chain. The steps that we have taken this year have built on the steps which took last year. Last year we:

(a) formed a committee to meet the challenges of the Modern Slavery Act 2015 (the Act) which includes our Director of Operations, a partner from our Risk Group and our Head of Employment. They report to the firm's Executive Committee;

(b) trained a number of key individuals and partners on the requirements of the Act and conducted an internal awareness campaign;

(c) audited all HR files to ensure that we had right to work information on files for all colleagues;

(d) drew up a list of all suppliers and conducted a desk top review of the risks of modern slavery within our supply chain;

(e) developed an Anti-Slavery Policy;

(f) prepared some provisions for our terms of business with suppliers which deal with modern slavery issues; and

(g) developed an Action Plan for next and subsequent years particularly around engagement with our supply chain.

2.2 Outside of our work within our own organisation, we conducted a major awareness and compliance campaign with our clients and prospective clients which included:

(a) partnering with an Independent Social Compliance Consultant to provide clients with legal and practical advice on meeting the challenges of modern slavery and compliance with the Act;

(b) suggesting to Legal Network TV that they produce a training video on the Act and then working with them to produce the content;

(c) organising a client awareness raising event and panel discussion involving charities and legal professionals working with victims of modern slavery; and
(d) writing extensively in articles and blogs on the issue of modern slavery.

3. Our structure, business and supply chains

3.1 Fieldfisher is a European law firm providing legal advice and legal services to a wide variety of clients in a range of sectors. Details of the sectors in which we operate and our expertise can be found at www.fieldfisher.com.

3.2 More specifically, 'Fieldfisher' is the trading name of Fieldfisher LLP, Fieldfisher (Belgium) LLP, Fieldfisher (France) LLP, Fieldfisher (Germany) LLP and Fieldfisher (Silicon Valley) LLP and Fieldfisher Consulting LLP, which provides consulting rather than legal services. A division of Fieldfisher LLP also trades as Condor.

3.3 It also identifies members of Fieldfisher Global, a Swiss Verein. Its members are Weili Fei Shi, a a partnership established under the laws of the People's Republic of China, Studio Associato Servizi Professionali Integrati, a partnership established under the laws of Italy and Fieldfisher NV a limited liability company established under the laws of the Netherlands. Fieldfisher Global does not itself provide legal or any other services to clients.

3.4 Fieldfisher LLP is covered by section 54 of the UK Modern Slavery Act 2015 because:

(a) we are a body corporate;
(b) carrying on business or a part of its business in the UK;
(c) which supplies goods or services; and
(d) which has a turnover of over £36 million per year.

3.5 We are primarily a "people business", employing legal and other professionals through whom we deliver legal services. In order to facilitate the provision of those services we are ourselves consumers of goods and services. Our first tier suppliers include:

(a) banking services from Lloyds Bank;
(b) rental of our London headquarters from Man Group;
(c) legal information services from Lexis Nexis and Thompson Reuters;
(d) facilities management from DCT Facilities Management Ltd;
(e) insurance services from Lockton Companies LLP;
(f) telecommunications from General Communication Inc;
(g) print and document management services from Right Document Solutions;
(h) private health provision for staff through CIGNA (through BUPA during 2016-17); and
(i) company information services from Katorox Limited.

4. Our policies on slavery and human trafficking

4.1 It is our policy to conduct all our business ethically and with respect for the individual. By way of example:
we were early adopters of the London Living Wage for all those working for us;

we have adopted as one of our four core values "respect" for colleagues and clients whatever their role, background, gender or belief; and

our National Equality Standard accreditation underlines our commitment to being inclusive.

4.2 Prior to the introduction of the Modern Slavery Act 2015 we had not identified modern slavery as being a particular risk in our business or supply chains. We do however, recognise that modern slavery is by its very nature difficult to identify and can occur both in the UK and overseas. Accordingly, we are committed to acting in accordance with and supporting the UK Government's Modern Slavery Strategy (as amended from time to time) and as outlined in the UK Home Office Guidance "Transparency in Supply Chains: a Practical Guide" published on 29 October 2015 (again, as amended from time to time). We will act ethically in all our business dealings and relationships wherever we operate and will implement and enforce effective and proportionate systems to counter any risk of slavery and human trafficking that we identify. We expect our suppliers to show the same commitment.

4.3 In order to demonstrate our commitment, to raise awareness and set standards we have developed an Anti-Slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

4.4 Our Anti-Slavery Policy is a step towards Fieldfisher having in place systems to:

(a) identify and assess potential risk areas in our business and supply chains;

(b) mitigate the risk of slavery and human trafficking occurring in our business and supply chains;

(c) monitor potential risk areas in our supply chains; and

(d) protect whistleblowers.

5. Due diligence processes for slavery and human trafficking

5.1 Last year, as part of our initiative to identify and mitigate risk in our own business we carried out a full audit all personnel files to ensure that we had up to date copies of right to work information – primarily copies of passports. One of the key factors in modern slavery is the exploitation of individuals who fear deportation due to their immigration status. A full audit of right to work documentation can therefore act to a large degree as an audit of whether any members of staff are likely to be working under duress and vulnerable to exploitation. Having carried out that audit we identified no incidences of individuals unable to provide right to work documentation. All recruits this year have been required to provide such documentation.

5.2 Given the nature of professional services a significant percentage of our suppliers are blue chip companies dealing with IT and office supplies. Outside of facilities (dealt with below) we did not identify any likely risks in the first tier of our supply chain.

5.3 Our Action Plan for the coming year includes a project to carry out due diligence on a proportion of our first tier suppliers to understand what actions they have taken in respect of their own supply chains to reassure Fieldfisher that we are contracting with companies that are themselves taking appropriate steps to ensure that slavery and human trafficking is not taking place in their
supply chains. Our risk assessment, used to identify which suppliers we should focus on, includes consideration of:

(a) **country risk**: identify countries where our suppliers operate that are vulnerable to slavery and human trafficking;

(b) **sector or industry risk**: identify what parts of our suppliers' businesses may be vulnerable to slavery and human trafficking;

(c) **business or transaction risk**: assess whether particular relationships or transactions are susceptible to slavery and human trafficking; and

(d) **product or raw materials risk**: assess where raw materials are sourced.

5.4 For those suppliers selected for further assessment we will be looking to identify:

(a) **commitment**: either to our Anti-Slavery Policy or an equivalent;

(b) **training**: what training our suppliers have provided to their staff on modern slavery;

(c) **risk monitoring and compliance**: we will be looking to identify any monitoring of risk by our suppliers and any effective controls and contingency plans in place to deal with the risk areas identified and to help identify what further steps need to be taken to manage that risk; and

(d) **remedial action**: we will be interested to understand what procedures our suppliers have in place for investigating potential breaches to help ensure compliance with anti-slavery policies where applicable.

6. **Parts of our business and supply chains where there is a risk**

6.1 As a professional services business employing professional people we have not identified a slavery and human trafficking risk in our own business.

6.2 Having drawn up a list of our first tier suppliers and examined that list, we are confident that we contract with blue chip companies where the risk of slavery and human trafficking taking place within those businesses is also likely to be very low. Our risk assessment concluded that although the risk was low, our outsourced facilities management was an area where we required further reassurance. This area covers:

(a) building security;

(b) office cleaning;

(c) concierge;

(d) reception; and

(e) switchboard.

6.3 During this financial year we organised training to address this issue (see below).

6.4 Our work in the coming year will aim to take our risk assessment beyond first tier suppliers into their own supply chains.
7. Effectiveness

7.1 It is too early to say with any certainty how effective the steps we are taking have been and will be in ensuring that slavery and human trafficking is not taking place in our business or supply chains. However, our Action Plan will develop targets against which we can measure our effectiveness. Our two main focuses last year were:

(a) conducting first tier supplier due diligence; and
(b) training key members of our own staff and those of our facilities supplier.

7.2 We made reasonable progress on our two main objectives:

(a) in conducting first tier supplier due diligence, in particular we compiled a comprehensive list of all businesses from which we purchase goods and services and carried out a desk top analysis of likely levels of risk in respect of each. Further steps will be taken in the coming year to engage directly with more first tier suppliers; and

(b) we trained key members of our own staff alongside those of some of our suppliers as planned (see below).

7.3 As part of our work for the next financial year we will be considering how best to monitor the effectiveness of any other actions taken. We are also proposing to conduct a survey of published Statements from other commercial organisations to see what steps they have taken and whether there is more that we might be doing.

8. Training

8.1 Last financial year, to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we:

(a) provided training to the members of the committee established to manage our response to the issue of modern slavery and compliance with Act;

(b) conducted an internal awareness campaign including:

(i) presenting to all partners of the firm on the requirements of the Act;

(ii) assisted Legal Network TV in the production of a training video on the requirements of the Act which we played on a continuous loop for a number of weeks on television screens around the firm; and

(iii) made our own training video on the requirements of the Act which was available on our intranet.

(c) prepared and circulated a briefing note for all partners on the nature of modern slavery and the requirements of the Act. This was circulated at the same time that we asked partners to approve the contents of this Statement.

8.2 This financial year, we conducted joint training on modern slavery and the requirements of section 54 of the Act, with those members of our own staff most likely to be involved in purchasing goods and services on before of the firm alongside key members of staff of those businesses which supply the firm with:

(a) building security;
(b) office cleaning;
(c) concierge services;
(d) reception;
(e) switchboard; and
(f) catering.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the members (partners) of Fieldfisher LLP and constitutes our slavery and human trafficking statement for the financial year ending 30 April 2017.

Signed:

[Signature]

Designated Partner

Name: Michael Chissick