



Pinsent Masons

Transparency Statement on Human Trafficking and Modern Slavery

(in compliance with the Modern Slavery Act 2015 (the "Act"))

1. INTRODUCTION

- 1.1 Our business is about providing responsible legal and other professional services to enable our clients to manage and address business risks. A commitment to behaving responsibly is at our core and it extends to everything we do, and to those with whom we interact.
- 1.2 We operate as a global business through Pinsent Masons LLP (head-quartered in London) and affiliated entities that practise under the name 'Pinsent Masons' or a name that incorporates those words. Pinsent Masons LLP and affiliated entities are also regulated by the appropriate regulatory body in the other jurisdictions in which they operate. We have around 3,200 people working in different jurisdictions. Details of our corporate structure and where we operate can be found on our main website - [Legal Notices](#).
- 1.3 Pinsent Masons LLP and its subsidiary Pinsent Masons Services Limited meet the criteria in section 54 of the Act and are therefore required to prepare a slavery and human trafficking statement. This Transparency Statement covers both entities.
- 1.4 Pinsent Masons LLP has a global turnover of c£450 million.
- 1.5 We partner with a number of organisations who help shape our commitment to doing business responsibly by providing us with specialist advice and support. This includes Stonewall, Business in the Community, Working Families, Employers Network for Equality and Inclusion, WEConnect and MSDUK.

2. OUR COMMITMENTS

- 2.1 We are opposed to any form of forced or bonded labour, including human trafficking and modern slavery (collectively referred to as "**forced labour**" in this Transparency Statement).
- 2.2 We are committed to:
 - 2.2.1 ensuring that there is no forced labour within our supply chains or in any part of our business; and
 - 2.2.2 implementing and enforcing effective systems and controls designed to address the risk of forced labour.

We act ethically and with integrity in all our business relationships.

3. **SUPPLY CHAIN MANAGEMENT**

3.1 **Nature of supply chain**

We provide legal services on a global basis. The supply chain that supports our business and provides the platform that enables us to provide legal services to clients is broad. It comprises a wide range of suppliers, from small/medium enterprises (SMEs) to global corporates, across many jurisdictions, including jurisdictions where there is a higher risk of forced labour. To illustrate the breadth of our supply chain, it encompasses products and services from IT hardware and software, knowledge management services, office design, fit-out and maintenance, recruitment agents and temporary staff provision, cleaning and catering services, through to outsourced services such as document production. This range means that we consider our supply chain to be our primary area of risk from a forced labour perspective.

3.2 **Assessing risk through supplier due diligence**

We have established a system for assessing the risk of forced labour associated with suppliers and/or potential suppliers. The system enables a supplier risk rating to be produced based on various risk factors such as country and service/product type and the relevance of suppliers to our business. We recognise that particular types of suppliers are likely to give rise to a higher risk of forced labour, in particular those utilising lower-wage staff such as security, couriers, cleaning, etc., and those utilising manufacturers in low-wage countries, such as IT hardware, and have weighted those types of suppliers accordingly. We also use the Global Slavery Index, Freedom House rankings and Corruption Perceptions Index to quantify the risk associated with certain countries. Where, through risk assessment, we perceive a particular risk of forced labour, we will undertake enhanced due diligence, asking additional questions during the procurement process tailored to the specific risks and utilising the resources and influence available to us to ensure the supplier meets acceptable standards.

3.3 **Incorporating forced labour risk reduction into process**

We have a set of checkpoints incorporated into our procurement process, from initial sourcing (business case), through the request for tender/proposal itself, and on to recommendation and contract approval, to ensure that at each stage the risks are considered, appropriate information is gathered and that supplier selection decisions are taken in the light of the risk of forced labour.

We require key suppliers to complete our Responsible Business Questionnaire and to commit to our Supplier Code of Conduct, which are designed to identify and/or enable us to address issues of forced labour (amongst other aspects of responsible business). We have adopted an electronic risk compliance system as the platform we will use to automate aspects of our sourcing processes, including due diligence with key suppliers and/or suppliers that are perceived as carrying a higher risk of forced labour.

3.4 **On-going monitoring**

Our Supplier Code of Conduct emphasises the need for active monitoring and audit through day to day management processes to ensure and maintain compliance to the Code of Conduct. The risk compliance platform referred to above may also be used for on-going monitoring by way of annual review. We incorporate a standing agenda item on responsible business in our quarterly and annual supplier reviews with our key suppliers.

3.5 **Communication**

Our procurement process is communicated to members of staff who have responsibility for supplier relationships (our "**buying community**") through two primary channels: policy and training. Our Procurement Policy, which is regularly updated, incorporates our approach to forced labour, and this is made available to all staff through our intranet. Training on modern slavery risks has been carried out for members of our buying community followed up with bulletins in our quarterly newsletter. Refresher training for the buying community is planned for 2018/19.

3.6 **Contracts**

We have incorporated provisions into our standard templates for supplier contracts to require suppliers to manage and reduce the risk of forced labour. These provisions require suppliers to recognise a commitment to removing forced labour and to take steps to reduce forced labour in their business and supply chain, and to provide information to us in relation to any instances of forced labour. We also retain the ability to terminate contracts where the supplier has failed to deal adequately with any such risks.

4. **EMPLOYMENT PRACTICES**

4.1 With respect to the global recruitment and employment of our own people we have implemented a number of measures as part of our commitment to ensuring there is no forced labour.

4.2 These measures include operating a preferred supplier list in relation to the recruitment agencies we work with and undertaking background checks in relation to new starters to our business relevant to the jurisdiction they will be working in.

4.3 Pinsent Masons is an accredited Living Wage Employer. This means that all of our people in the UK, regardless of whether they are direct employees or third-party contracted staff, receive a minimum hourly wage. The Living Wage is an hourly rate set independently and updated annually and it is calculated according to the real costs of living.

5. **OUR EFFECTIVENESS IN COMBATTING FORCED LABOUR**

5.1 To ensure a high level of understanding of the risks of forced labour in our supply chains and our business, appropriate levels of training will be provided to our people. Our training programme for calendar year 2019 will include modern slavery awareness training for all our people in the jurisdictions where we operate.

5.2 We believe that this, coupled with our approach to supply chains and our open and transparent culture, is effective in combatting forced labour within Pinsent Masons LLP and its supply chains.

This Statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Pinsent Masons' forced labour statement for the financial year ended 30 April 2017. The Board of Pinsent Masons LLP is responsible for implementing this Statement and its objectives and providing adequate resources, training and investment to ensure that forced labour is not taking place within Pinsent Masons LLP or within its supply chain.

This Statement will be reviewed annually and made available on our website.

Richard Foley, Senior Partner, October 2018

