

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Section 54, Modern Slavery Act 2015

Kingsley Napley LLP financial year ending on 30 April 2018

This statement has been prepared and is published in accordance with the requirements of Section 54 of the Modern Slavery Act 2015. It sets out the steps which Kingsley Napley LLP has taken and is taking to prevent and detect slavery and human trafficking in its own business and in its supply chain, and its assessment of the associated risks.

1 Our business

- 1.1 Kingsley Napley LLP is a limited liability partnership incorporated in, and under the laws of, England and Wales. The LLP is owned and controlled by its members (who we call partners). The Solicitors Regulation Authority authorises it and regulates it.
- 1.2 We operate in the professional services sector out of a single office located in London. We provide a broad range of legal services to a diverse client base which originates from both the United Kingdom and abroad.

2 Our approach

- 2.1 Operating our business in a responsible manner for the benefit of our own people and our clients, and in a manner which makes a positive contribution to the wider community and to the environment, is important to us.
- 2.2 We aim to comply not only with the letter but also with the spirit behind all the laws and regulations which govern our business and our activities, no more so than in the case of people based requirements of the kind that this statement deals with.
- 2.3 Our high level and over-arching Statement of Core Responsible Business Principles identifies some of the practical ways in which our wish to be a responsible business manifests itself in the day to day life of the firm: this Modern Slavery Act Statement expands upon paragraph 5 of that statement.

3 Our initiatives

- 3.1 An Anti-Slavery Steering Group comprising people of all levels of seniority who work in relevant practice areas and support teams has been established to lead and support our anti-slavery activities. Its members act as 'Anti-Slavery Champions', in particular by helping to raise awareness in the firm of the issues of forced labour and human trafficking. The Steering Group reports to the Management Team.
- 3.2 Initiatives to raise awareness of the issues of forced labour and human trafficking have taken place throughout the firm. Practice areas (such as immigration) and support teams (such as human resources) which potentially have greater exposure to these issues on a day to day basis were given more in-depth guidance.

- 3.3 To help us identify and assess the risk of slavery or human trafficking occurring in our own business and/or in our supply chain, we have undertaken risk-based reviews of our own business and of all our current suppliers. The outcomes of these reviews and our assessments of the associated risks are summarised below.

4 Our people

- 4.1 Our recruitment procedures and employment practices comply with applicable laws, including immigration laws, and reflect best practice in the legal profession. We respect our people and always try to treat them properly and fairly. We wish them to be content in their work and to feel appropriately remunerated for their efforts. Everyone is paid above the mandatory national minimum wage and at or above the voluntary London Living Wage, which is higher. We offer a range of training opportunities to help them develop their skills and careers. We also offer flexible working arrangements to help them find a work-life balance that suits them and us. A wide range of benefits are also available to everyone.
- 4.2 We recognise that a diverse workforce gives us access to different cultures, experiences and views which in turn benefit our own business and our clients. As an equal opportunities employer, we work hard to cultivate an inclusive culture and a working environment where everyone can succeed based solely on merit, and which is free from discrimination, bullying and harassment.
- 4.3 We have processes in place to ensure that our premises and our working practices provide a safe environment in which to work. Our health and safety activities are complemented by our wellness programme which offers a range of health related benefits and initiatives which are open to everyone.

5 Our suppliers

- 5.1 Our suppliers support us in providing our legal services. We have created an online facility to help us map out, gain visibility on and manage our supply chain. We have used it to identify and assess: who our suppliers are; what sectors they operate in; what goods or services they supply to us; where they are located geographically; and where they in turn are likely to source resources or suppliers from geographically.
- 5.2 The nature and composition of our supply chain reflects our activities as a provider of legally focused professional services. Some of our suppliers are small owner-managed businesses operating locally (such as suppliers of sandwiches and plants). Others are big corporations, many of them household names, which operate globally (such as technology companies, international airlines and insurers). As is the case with most law firms, our biggest areas of expenditure on external suppliers relate to premises, technology, marketing and the procurement of other professional services, in particular banking, insurance, audit and accounting services.
- 5.3 We wish only to engage and work with suppliers who share our own values. We expect our suppliers to operate their own businesses and their own supply chains responsibly, in accordance with all applicable laws and regulations and to the highest ethical standards. We have a Supplier Code of Conduct which tells our suppliers what our values are and what we expect of them.
- 5.4 An internal Procurement Protocol describes the firm's expectations of its suppliers and how support teams should go about selecting a new supplier and managing an existing supplier. It includes a checklist of compliance and risk related considerations. Forced labour and human trafficking are mentioned.

5.5 We are a signatory to the Charter of the London Living Wage Foundation whose requirement that everyone working in London should be paid not just the national minimum wage but a living wage for London extends not only to our own people but also to our key suppliers. We have engaged with those of our key suppliers who operate in low paying sectors of the economy (such as cleaning, catering and security) to ensure, and we have received written commitments from each of them confirming, that those of their people who they deploy to work for us are also paid at least the London Living Wage, as are our own people.

6 Our risks

6.1 Because we are based in the United Kingdom, we are governed by UK laws and UK regulations, we operate in the professional services sector as a regulated law firm, our workforce is directly employed, highly educated and in many cases professionally qualified, and internally we have adopted a range of people and ethical policies and procedures which we use to manage and operate our business, we consider that there is a low risk of slavery or human trafficking occurring within our own business.

6.2 For the same reasons, we also consider that our supply chain is similarly low risk. We acknowledge however that there is a greater risk of slavery and human trafficking occurring in certain areas of our supply chain than in our own business. It is towards our supply chain therefore that most of our anti-slavery and anti-people trafficking activities are directed. They include making sure that the support teams which select suppliers and manage supplier relationships are aware of their legal obligations in this area, comply with our internal Procurement Protocol and ensure that the suppliers for which they are responsible comply with our Supplier Code of Conduct, including in the areas of forced labour and human trafficking. A risk-based approach is adopted. Higher risk goods or services and higher risk suppliers are the focus.

6.3 A firm member who believes that slavery or human trafficking is or might be occurring inside our own business, in our supply chain or in connection with a client matter in respect of which we are instructed and who does not feel comfortable reporting their concern in the normal manner or through the usual channels may raise the matter using the 'whistle blowing' policy and arrangements we have put in place.

The firm's General Counsel prepared this statement in conjunction with all the members of the firm's Management Team, Compliance Committee, Responsible Business Committee and Anti-Slavery Steering Group. The Management Team approved the statement on behalf of Kingsley Napley LLP's members on 29 June 2018. The Senior Partner, Managing Partner and General Counsel have signed the statement as evidence of such approval, and as evidence of the firm's commitment to prevent and detect slavery and human trafficking.

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