

KINGSLEY NAPLEY

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern Slavery Act 2015, Section 54

Statement of Kingsley Napley LLP for the financial year ending on 31 March 2025

This statement has been prepared and is published on this website in accordance with the requirements of Section 54 of the Modern Slavery Act 2015. It summarises some of the steps which Kingsley Napley LLP has taken to prevent and detect slavery and human trafficking in its own business and in its supply chain and the firm's assessment of those risks.

1 Our business

- 1.1 Kingsley Napley LLP is a limited liability partnership incorporated in England. It has one office located in London, and a workforce of approximately 500 people.
- 1.2 We operate in the professional services sector as an independent law firm and are authorised and regulated by the Solicitors Regulation Authority. We provide a broad range of legal services to individual, business and government clients from the UK and abroad. Further information about the firm and its services is available on this website.

2 Our approach

- 2.1 Our aim is always to comply with the laws and regulations that govern our business and our activities. We also try to give effect to the spirit behind them, especially in areas which have a people focus, such as the subject matter of this statement.
- 2.2 Operating our business in a responsible manner, for the benefit of our own people and our clients, and making a positive contribution to the communities we serve, and to the environment, are also important to us, and are what we always try to do.
- 2.3 A Statement of Core Responsible Business Principles which 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 is also published on this website. This subject specific statement elaborates upon paragraph 5 of that more general over-arching document.

3 Our initiatives

- 3.1 A Steering Group of Anti-Slavery Champions supports our anti-slavery activities by helping to raise awareness within the firm of the issues, risks and warning signs. The group comprises people of different roles and levels of seniority drawn from across the firm but particularly from those legal practice areas and business support teams for whom slavery and trafficking issues are potentially most relevant.
- 3.2 Our awareness raising initiatives include providing mandatory online training to all firm members, and to all new joiners during their induction programme. Practice areas (such as Immigration) and business support teams (such as Human Resources, Business Acceptance and Facilities) whose roles or work has the potential to give them greater exposure to slavery and trafficking issues and risks receive additional guidance and ongoing support through their designated Anti-Slavery Champion.

- 3.3 Any member of the firm who suspects that slavery or trafficking is or might be occurring in our own business, in our supply chain, or in connection with a client matter in which we are instructed is encouraged to speak to their line manager or other appropriate person promptly. The firm's 'whistle-blowing' arrangements can be used to report an issue or concern if someone is not comfortable reporting it through the usual channels.
- 3.4 We have also conducted risk-based reviews to help us assess and manage the risk of slavery or trafficking occurring in our own business or in our supply chain. Summarised below are the outcomes of those reviews and our assessments of the risks.

4 Our people

- 4.1 Our recruitment procedures and our people management practices comply with UK immigration, employment and health and fire safety laws. They also reflect best practice in the UK legal profession. For many years we have been highly ranked by an independent 'best employer' accreditation scheme.
- 4.2 We respect our people and always try to treat them 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. A wide range of benefits, including paid holiday, is available to everyone. Training opportunities to help firm members develop their skills and their careers are also provided. Flexible working arrangements to help them find a work-life balance that suits them are also offered.
- 4.3 We recognise that a diverse workforce provides us with access to different cultures, experiences and views which in turn benefits our business, people and clients. As a responsible business and 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.
- 4.4 Our building and our working practices comply with health and fire safety laws and provide our people with a safe and comfortable working environment. Our health and safety activities are complemented by a comprehensive wellness programme which offers a broad range of health-related benefits and initiatives to all firm members.

5 Our suppliers

- 5.1 We recognise that certain areas of our supply chain are potentially more exposed to slavery or trafficking issues and risks than is our own business. Because of that, we have created an online resource to help us map out, gain visibility on and manage our supply chain. We use it to identify and assess: who our suppliers are; what sectors they operate in; what products or services they supply to us; where they are located geographically; and, if possible, from where in the world they might source commodities or their own suppliers. The Head of Central Operations leads and manages a risk-based Supplier Management Programme which includes inception processes for, and ongoing monitoring of, key suppliers and higher risk suppliers.
- 5.2 The nature and composition of our supply chain reflects our activities as a provider of legally focused professional services. Some are small, owner-managed businesses operating locally or nationally (such as catering providers and courier companies). Others are very large companies, many of them household names, which operate globally (such as banks, insurers and technology companies). As with all law firms, our largest areas of expenditure do not involve the sourcing of commodities or products and instead relate to premises, technology, marketing and the procurement of other professional services (such as banking, insurance, audit and tax services).

- 5.3 We only wish 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 applicable laws and regulations, and to the highest ethical standards. The above-mentioned Statement of Core Responsible Business Principles, and a Supplier Code of Conduct which we have also prepared, tell our suppliers what our values are and what we expect of them. An internal Procurement Protocol supports them by providing business support team members with guidance on selecting and managing suppliers. The protocol contains a checklist of compliance issues and risk considerations for them to have regard to when selecting or managing suppliers, and includes reminders about forced labour and human trafficking risks.
- 5.4 The firm is 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 certain of 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 We are based in the United Kingdom, which respects the rule of law and human rights, and has strong protections for people, workers and labour rights. We do not have an office, or employ people, overseas. We operate in the professional services sector as a regulated law firm. We do not work in a sector or industry which is higher risk for slavery or trafficking purposes. Our labour needs are not manual or seasonal, and our workforce is not hired in from other elsewhere. Our people are directly engaged, highly educated, and in many cases, professionally qualified. Our wish to operate our business compliantly and responsibly is underpinned by a comprehensive set of arrangements which we have put in place to address all aspects of business conduct, professional ethics and people management. We consider that there is a low risk of slavery or human trafficking occurring within our own business for these reasons.
- 6.2 Although for those same reasons we believe that our supply chain is also low risk, we also recognise that there is potentially a greater risk of slavery or human trafficking occurring in certain areas of our supply chain than there is in our own business. It is towards our supply chain therefore that most of our anti-slavery and anti-trafficking activities and monitoring is directed. Suppliers, products and services which we consider have the potential to be higher risk for these purposes receive the most scrutiny and attention from the above-mentioned Supplier Management Programme.

This statement was prepared by the firm's General Counsel in conjunction with the Management Team, Compliance Committee and Anti-Slavery Champions all of whom have approved it. The Senior Partner, Managing Partner and General Counsel have put their names to the statement below as evidence of such approval and as evidence of the firm's continuing commitment to prevent and detect slavery and human trafficking.

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Matt Meyer
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Kingsley Napley LLP

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