



# ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2018

**HFW is committed to preventing acts of modern slavery from occurring within its business and supply chain and expects the same high standards of its suppliers.**

## **Our structure**

HFW is an international law firm, advising clients on all aspects of international commerce. We have over 600 lawyers working in offices across the Americas, Europe, the Middle East, Asia and Australia. For a list of our group entities, please go to <http://www.hfw.com/Privacy-Notice-Who-We-Are>.

## **Our policies**

As part of our commitment to combating modern slavery, we have reviewed our Anti-Modern Slavery Policy and Whistleblowing Policy, which implement procedures to:

- Identify and assess areas of potential risk in our business and supply chains
- Continually monitor potential risk areas in our business and supply chains
- Reduce the risk of modern slavery occurring in our business and supply chains
- Provide adequate protection for whistleblowers

## **Due diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- Performed an annual audit of our international offices to ensure that all our staff are paid at least the minimum wage for their jurisdiction
- Continued to integrate the Anti-Modern Slavery Policy into our procurement procedures and made it freely available to all suppliers, contractors and business partners

## **Monitoring**

HFW evaluates the nature and extent of the risk of modern slavery occurring in its supply chains on an ongoing basis. The Management Board has overall responsibility for ensuring the Anti-Modern Slavery Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

We assess any instances of non-compliance on a case-by-case basis and will tailor remedial action appropriately.

## **Training**

We are committed to ensuring our staff are equipped to recognise the risks of modern slavery in our business and supply chains. Through our induction and ongoing training programmes, employees are encouraged to identify and report any potential breaches of our Anti-Modern Slavery policy. All employees also have access to practical guidance regarding our policies and procedures.

## **Key objectives**

We are using key objectives to measure how successful we have been in ensuring that modern slavery is not taking place in any part of our business or supply chains.

Our key objectives for this year have been achieved and are as follows:

- Review updated Government guidance
- Review all relevant policies and procedures
- Perform an annual audit of our international offices
- Continue to apply our anti-modern slavery policy to our procurement procedures
- Roll out online training courses for new and existing staff

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Holman Fenwick Willan LLP's slavery and human trafficking statement for the financial year commencing 1 April 2017 and ending 31 March 2018.

## **GAVIN HADFIELD**

**Compliance Officer for Legal Practice, HFW**  
**9 September 2018**