

# ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FINANCIAL YEAR ENDING 31 MARCH 2023

**This statement is made on behalf of Holman Fenwick Willan and its subsidiaries (together, “HFW”), pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) for the financial year commencing 1 April 2022 and ending 31 March 2023. References to “we”, “us” and “our” are to HFW as defined above.**

## HFW and its organisational structure

HFW is an international law firm, advising clients on all aspects of international commerce with industry expertise in aviation, construction and shipping, providing specialist advice across global commodities, energy and insurance markets. We have over 1100 partners and staff worldwide with offices and related undertakings across the Americas, Europe, the Middle East, Asia and Australia.

HFW has its headquarters in London, operating as a limited liability partnership in England and Wales (with registered no. OC343361), and authorised and regulated by the Solicitors Regulation Authority (SRA no. 509977). Further information about HFW, including our corporate structure and information on the jurisdictions in which we operate, can be found on our Legal Notices page: [www.hfw.com/Legal-Notices](http://www.hfw.com/Legal-Notices).

HFW complies with all applicable employment law relating to employee terms and conditions, and pay, and has been accredited as a UK Living Wage Employer by the Living Wage Foundation.

## Policies in relation to slavery and human trafficking

As part of our commitment to combatting modern slavery, HFW has a number of policies and procedures relevant to modern slavery and human trafficking, which set out our commitment to acting ethically in all our business dealings. These policies are made available to all HFW employees on our intranet.

These policies include:

- Anti-Bribery & Corruption Policy
- Anti-Modern Slavery Policy
- Whistleblowing Policy

These policies set out HFW’s responsibilities and the responsibilities of all individuals working for or with us, as well as providing information and guidance to those working for or with the firm on how to recognise and deal with modern slavery and/or human trafficking issues. Internal control systems and procedures are subject to periodic review to ensure that they are effective.

## Due diligence processes

HFW has established long-term relationships with many of the service providers we engage, including but not limited to catering, cleaning and hospitality providers. HFW does not make demands of such suppliers that may result in them violating applicable modern slavery regulation.

To monitor and reduce the risk of modern slavery and human trafficking occurring within our supply chain.

HFW undertakes appropriate due diligence on potential suppliers and aims to review the suppliers’ modern slavery statements (where they are required to have one) and require the supplier to contractually warrant that they are compliant with applicable modern slavery legislation and that they are not involved in, complicit with or associated with slavery and/or human trafficking.

## Risk assessment and management

Given the nature of our work and the recruitment processes we have in place, employees directly employed by HFW present no risk from a slavery and/or human trafficking perspective.

In relation to HFW’s supply chain, we work with reputable suppliers and expect them to implement a zero-tolerance approach to modern slavery and human trafficking.

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

HFW’s 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.

## Training on modern slavery and trafficking

We are committed to ensuring our staff are equipped to understand and recognise the risks of modern slavery within our business and supply chains. Guidance regarding our policies and procedures on modern slavery is available to all employees on our intranet.

## Key objectives for the financial year 2023/2024

HFW will continue to review its global procurement processes with the aim of ensuring that there is a consistent approach to supplier onboarding and due diligence across the HFW network.

We will be promoting the availability of online training courses in respect of modern slavery for our employees and partners across our global practice.

This statement was approved by HFW’s Management Board on 26 September 2023. This statement will be reviewed annually and made available on our website.

Signed:

**JEREMY SHEBSON**

Managing Partner and Designated Member