

# ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2016

**Holman Fenwick Willan LLP (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 450 lawyers working in offices across Asia, Australia, the Middle East, Europe and South America. To find out more about the nature of our business, please [click here](#).

## Our policies

As part of our commitment to combating modern slavery, we have implemented a new Anti-Modern Slavery Policy and updated our Whistleblowing Policy to include incidences of modern slavery. We have also introduced procedures designed 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:

- Introduced an annual audit of our international offices to ensure that all our staff are paid at least the minimum wage for their jurisdiction.
- Our Anti-Modern Slavery Policy has been integrated into our procurement procedures and is freely available to all suppliers, contractors and business partners.

## Monitoring

HFW will evaluate 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 will 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 programmes, employees are encouraged to identify and report any potential breaches of our Anti-Modern Slavery Policy. Existing employees have been provided with a guidance note regarding our new 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:

- Familiarise ourselves with the Act and accompanying Government guidance.
- Implement a new Anti-Modern Slavery Policy.
- Implement measures designed to spread awareness of the issue throughout the firm.
- Integrate our Anti-Modern Slavery Policy into our procurement procedures.
- Attend external discussion groups to ensure we are in line with best practice.

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 2015 and ending 31 March 2016.

### Otilie Sefton

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Lawyers for international commerce

[hfw.com](http://hfw.com)

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