

ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FINANCIAL YEAR ENDING 31 MARCH 2026

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 2025 and ending 31 March 2026. 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 1200 staff, including partners, 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.

HFW complies with all applicable employment laws in the jurisdictions in which it operates, relating to employee terms and conditions, pay, working time, leave entitlements, equality and non-discrimination. The firm maintains robust recruitment, onboarding and employment processes designed to ensure that all workers are employed voluntarily and have the legal right to work in the relevant jurisdiction. HFW also conducts appropriate pre-employment screening and right to work checks, where legally permissible, and is committed to providing fair and transparent employment practices across its global workforce. In the UK, HFW has been accredited as a 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
- Anti-Modern Slavery Guidance
- Corporate Responsibility Policy
- Global Fraud Prevention Policy
- Procurement 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. In addition, employees also have access to a range of reporting channels. 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.

In order to reduce the risk of modern slavery and human trafficking occurring within our supply chain and to ensure compliance with applicable modern slavery legislation, HFW undertakes appropriate due diligence on both potential suppliers and existing suppliers as contracts are renewed.

Risk assessment and management

As an international law firm, HFW is committed to the highest standards of ethical conduct and we comply with all laws, regulations and rules which are applicable to our business. We are committed to taking steps to ensure that slavery and human trafficking do not occur in our organisation or in our supply chains.

As a professional regulated law firm, we consider the risk of modern slavery occurring within our business to be low.

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. Mandatory training is rolled out across the firm on the risks of modern slavery which all relevant staff across the firm must complete.

Key objectives for the financial year 2026/2027

- HFW will continue to review its global procurement processes to improve supplier onboarding and due diligence across the HFW network.
- We will continue to roll out online training on modern slavery to all relevant staff.
- We will continue to roll out our Ethical Supplier Code of Conduct to our supplier base, as appropriate.
- We will continue to address modern slavery issues in supplier contracts, as appropriate.

This statement was approved by HFW's Management Board on 25 August 2026. This statement will be reviewed annually and made available on our website.

Signed:



JEREMY SHEBSON

Managing Partner and Designated Member