

Clifford Chance

Human rights
& modern
slavery



Human rights & modern slavery

The firm is a signatory to the UN Global Compact and supports the UN Sustainable Development Goals. We seek to protect human rights in our business and in our supply chains by encouraging behaviours and practices that are aligned with our global Human Rights and Slavery and Human Trafficking policies and Modern Slavery Act Transparency Statement. These include commitments to respect human rights consistent with the UN Guiding Principles on Business and Human Rights and the UN Global Compact, and to take steps to ensure that modern slavery in all its forms does not occur in our business or in our supply chains.

“Supply chains” refers to the sequence of activities or processes involved in the delivery of services to our firm and our clients. We therefore expect our suppliers, their subsidiaries, subcontractors, and third and fourth parties to help identify and address adverse human rights impacts, including modern slavery, within their own business operations and supply chains. Outlined below are the key minimum standards we expect from all our suppliers, and which we expect them to promote with their subsidiaries, subcontractors and in their end-to-end supply chain.

Minimum standards:

<p>Legal Compliance & Standards</p>	<ol style="list-style-type: none"> 1) The Supplier shall comply with all applicable laws (whether at an international, national, federal, state or local level) and not engage in any activity, practice or conduct that would constitute an offence under section 1, 2 or 4 of the Modern Slavery Act 2015. 2) The Supplier shall respect all internationally recognised human rights consistent with the UN Guiding Principles on Business and Human Rights and the UN Global Compact, including by adopting behaviours and practices that are aligned with our global Human Rights and Slavery and Human Trafficking policies.
<p>Business Operations & Supply Chains</p>	<ol style="list-style-type: none"> 1) The Supplier shall take appropriate steps, proportionate to their capacity and risk profile, to identify and address adverse human rights impacts, including modern slavery¹ within their business operations and supply chains. In addition to modern slavery, other relevant human rights impacts may include adverse impacts on peoples’ privacy²; workers’ health and safety,³ communities and the environment; and indigenous communities. 2) In relation to its own business and people, this shall include the Supplier taking appropriate steps to ensure: <ol style="list-style-type: none"> 1) all its people are afforded the freedom to choose employment voluntarily and can exercise their right to collective bargaining and association.⁴ 2) its people are not subject to discrimination, harassment or inhumane treatment in the workplace; 3) a safe and hygienic working environment is provided to all its people. 4) all its people are entitled to work and to be paid for a minimum level of working hours, that working hours are not excessive, and that working hours comply at least with international conventions; and 5) it has appropriate and effective grievance and whistleblowing mechanisms in place for human rights and modern slavery issues and proactively promotes these mechanisms.

1. This includes any forced, bonded or compulsory labour, or any other forms of slavery, child labour or human trafficking.

2. More information about the standards we expect in this area are set out in the Data privacy and AI Principles for Suppliers Standards- <https://www.cliffordchance.com/about-us/who-we-are-and-how-we-work/policies/supplier-standards/supplier-standards.html>

3. More information about the standards we expect in this area is set out in the Health & Safety Standard – <https://www.cliffordchance.com/about-us/who-we-are-and-how-we-work/policies/supplier-standards/supplier-standards.html>

4. Where these rights are restricted by applicable law, the Supplier will not hinder the development of alternative means of independent and free association and bargaining

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(continued)

Training & Awareness	<ol style="list-style-type: none">1) The Supplier shall take appropriate steps to ensure:<ol style="list-style-type: none">1) that its people understand what modern slavery is and the circumstances in which it may occur, are aware of modern slavery risk indicators, and are equipped to identify instances of possible slavery and human trafficking.2) that relevant decision-makers within core business functions have the requisite level of knowledge and understanding of modern slavery risks that will enable them to identify issues and address them appropriately.3) that its people are engaged and have technical and organisational measures in place to identify and manage modern slavery risks.2) The Supplier shall, at least annually, provide appropriate training to its people, relevant decision-makers, and its suppliers to support the identification and management of other relevant adverse human rights impacts.
Reporting	<ol style="list-style-type: none">1) The Supplier shall notify Clifford Chance without undue delay if it identifies or reasonably suspects, based on credible information, any incidences of modern slavery and/or other severe adverse human rights impacts, within its business operations and/or supply chains.

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Document Owner: Procurement
Approved By: Global Head of Procurement
Date Approved: 28th August 2025
Date for Review: August 2026
Version: 1.4
Classification: Public

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