

**MODERN SLAVERY ACT
TRANSPARENCY STATEMENT
OCTOBER 2016**

This is a statement of the steps that Clifford Chance has taken to ensure that slavery and human trafficking are not taking place in our business or in our supply chains. This statement is for the financial year ending 30 April 2016, in accordance with section 54 of the Modern Slavery Act 2015.

OUR VALUES

As a leading global law firm we are rightly held to high standards in all we do. We believe that our licence to operate, the sustainability of our business and the achievement of our aim to be the law firm of choice for the world's leading businesses are dependent on our ability to inspire trust and earn the confidence of all our stakeholders. To do this we must act responsibly, creating long-term value and supporting their future success. This includes supporting the objectives of the Modern Slavery Act 2015.

**BUSINESS, ORGANISATIONAL
STRUCTURE AND
SUPPLY CHAINS**

Clifford Chance is an integrated international law firm which provides legal services across the key markets of the Americas, Asia Pacific, Europe, the Middle East and Africa. We have 35 offices in 25 countries, focusing on the core areas of commercial activity - capital markets; corporate and M&A; finance and banking; real estate; tax, pensions and employment, and litigation and dispute resolution. The firm is led by about 550 partners, with a total headcount of around 6,000 including lawyers and business services staff.

Our principal partnership is Clifford Chance LLP, a limited liability partnership incorporated under English law. In some jurisdictions we practise through this partnership, in others through a local entity which uses the Clifford Chance name. Our practices are supported by a number of wholly-owned service companies. The members, shareholders, partners and directors of all these entities are subject to the governance of Clifford Chance LLP. Each of the 35 offices is managed locally

by one of our senior partners, supported by professional managers and experts as appropriate. For more information about us, our business and our structure, see [Who we are and how we work](#).

Our supply chains relate to our global office-based professional service business – supplying personnel, goods and services to support the services we in turn supply to our clients. Some of our suppliers are engaged on a global basis; others are local. We carry out due diligence on new suppliers, and seek to establish and maintain relationships with our suppliers with a view to ensuring that all elements of our supply chain act in accordance with applicable laws, our values and ethical business principles.

POLICIES

Clifford Chance has a global policy relating to slavery and human trafficking. Clifford Chance opposes all forms of slavery and human trafficking, and we are committed to taking steps to ensure that these do not occur in our business or in our supply chains.

Our modern slavery policy is part of a suite of policies affirming our commitment to responsible, sustainable and ethical business. In 2009, we signed the UN Global Compact as a demonstration of our commitment to help advance sustainable business models and markets with a view to creating a more sustainable and inclusive global economy. We actively support the UN Global Compact's 10 principles focusing on the core areas of human rights, labour, the environment and anti-corruption and report annually on our compliance: see our [Responsible Business report](#) and our [Global Reporting Index](#). We also have a global human rights policy as follows:

The UN Guiding Principles on Business and Human Rights which were unanimously endorsed by the Human Rights Council in 2011 state that all business enterprises have a responsibility to respect human rights. As a firm we

have agreed to support and respect internationally recognised human rights, both as part of our commitment to the UN Global Compact and consistent with the UN Guiding Principles.

Our employment and labour practices reinforce our approach to modern slavery. We create a safe, healthy and inclusive workplace with a strong culture of collaboration and respect for others. This is underpinned by a number of policies relating to diversity, dignity and inclusiveness which reflect a business environment in which our ethical values are promoted and we adhere to all applicable laws in all jurisdictions in which we operate. For some of our practices and initiatives, see [People & inclusion](#).

**DUE DILIGENCE AND
RISK ASSESSMENT**

In early 2016, we commenced the process of reviewing Clifford Chance's business and supply chains to identify and assess the risk of slavery and human trafficking in each of those areas, the measures already in place to address such risks, and any additional measures that may be warranted in light of the review. As a professional services firm strictly regulated by professional regulatory bodies in each of the jurisdictions in which we operate, and in the light of our global employment and ethical policies and practices, we have assessed that we are at low risk of slavery or human trafficking existing within our own business, although we have taken steps through our policies and training in particular to seek to ensure we are alert to possible risks of modern slavery in our business, and prepared to address any that may arise. We consider there is a greater risk of slavery or human trafficking occurring within our supply chains (including suppliers of personnel, goods and services).

We acknowledge that slavery and human trafficking exist in many jurisdictions in which we operate, and/or from which we procure goods or services, and accordingly are implementing measures

described in this statement that are designed to facilitate the identification of any relevant issues that may arise, and ensure they are addressed appropriately. We have developed an approach to due diligence which extends to both our business and our supply chains, and are implementing further steps to address the relevant risks within both.

Our ongoing due diligence comprises:

- a local review of each office, as part of which responsible managers are required to consider whether their office might, directly or indirectly, be associated with any suppliers which may be particularly susceptible to slavery or human trafficking, and to highlight any concerns. Our central risk management team will then work with our local offices to address any issues that arise; and
- a central risk-based assessment of our current supply arrangements globally with a view to enhancing existing arrangements where appropriate, to further ensure that slavery and modern slavery may not occur within our supply chain.

PROCUREMENT PROCESSES

Alongside conducting a risk-based review of our existing supply chains, we are taking steps to build and expand a framework specifically to address the risk of slavery and human trafficking as follows:

- We have developed a supplier questionnaire designed to assess

the risk of slavery and human trafficking in the business and supply chains of a proposed supplier prior to entering into any new supply relationships. This questionnaire will also be applied prior to the renewal of existing supply contracts.

- We have developed a process to ensure that appropriate contractual provisions are incorporated into new supplier contracts and renewals of existing contracts, which as a minimum require a supplier to take steps to ensure that slavery and human trafficking are not taking place in its business or in its supply chains, and, where appropriate:
 - require a supplier to establish processes and policies to ensure that slavery and human trafficking are not taking place in its business or in its supply chains,
 - enable us to obtain information to verify compliance (including by the commissioning of independent third party audits); and
 - enable us to terminate the contract for breach of these requirements, though if an issue does arise we intend where possible to engage with the supplier in question and encourage or assist the supplier to take appropriate steps to mitigate or remedy the issue.

We have developed a [Supplier Code of Conduct available on our website](#)

that sets out the standard of conduct Clifford Chance expects from all our suppliers and contractors worldwide and which covers slavery and human trafficking. In order to assess effectiveness of our measures in ensuring that slavery and human trafficking are not taking place in the firm's business or supply chains, we plan to develop procedures for monitoring compliance and implement appropriate performance indicators.

TRAINING, AWARENESS AND CAPACITY BUILDING

We are committed to ensuring that Clifford Chance personnel are equipped to identify risk factors and indicators of possible slavery and human trafficking, understand the implications of the Modern Slavery Act for our business, and react appropriately:

- We have developed and deployed a mandatory training module for all our lawyers, including all our partners, in relation to the issues the Modern Slavery Act raises for Clifford Chance and its business
- We have also developed and deployed specific targeted training for groups of our business services staff, such as the teams involved in procurement and human resources, in relation to the issues relevant to their areas of work for Clifford Chance.

This statement is made by Clifford Chance LLP on behalf of itself and those entities which operate as part of the Clifford Chance group and are subject to the governance of Clifford Chance LLP ("**Clifford Chance**").

SIGNED

DATE



.....25/10/2016.....

MATTHEW LAYTON

Managing Partner, Clifford Chance LLP
for and on behalf of Clifford Chance