

HOWARD KENNEDY

Modern Slavery and Human Trafficking Statement

This statement is made on behalf of Howard Kennedy LLP (the "Firm") pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act").

It constitutes the Firm's modern slavery and human trafficking statement for the financial year ending 30 April 2022.

The Firm is registered in England and Wales and its office is in London. The Firm employs approximately 400 people and provides a wide range of legal services to its clients.

The Firm is committed to the highest standards of ethical behaviour and complies with all laws, regulations and rules applicable to its business. Furthermore, it is committed to taking steps to ensure that modern slavery and human trafficking does not occur in any part of its business or in its supply chains.

The Firm's Approach

To ensure adherence to the Act and to ensure that no slavery or human trafficking exists in the Firm's business or, so as far as reasonably possible, in its supply chains, as reported in our prior statements the Firm has undertaken the following steps:

- a review of the Firm's own recruitment policies and practices and its contracts of employment; and
- an analysis of the Firm's suppliers and their business practices by requiring 20 of them to complete the Firm's Modern Slavery Act questionnaire.

Suppliers were selected to participate based upon the following criteria:

- i) the value of supplies made to the Firm;
- ii) the type of supply and whether goods provided are produced in jurisdictions that are high on the modern slavery index or services via personnel; and
- iii) physical location of the supplier i.e. are they located in a jurisdiction that is high on the modern slavery index.

The responses to these questionnaires have been analysed by the Firm and it is satisfied that as far as it is aware, no modern slavery or human trafficking can be detected in any of the Firm's supply chains.

Supplier Due Diligence

The Firm has a procurement process requiring the supplier to explain its own compliance with the Act amongst other laws and regulations. This enables the firm to consider the supplier's adherence to the Act and whether it is a suitable supplier to the Firm.

The Firm does not knowingly engage with businesses involved in modern slavery or human trafficking and will report any organisations where there are reasonable grounds to suspect their involvement. All of the Firm's suppliers are expected to adhere to all laws and regulations applicable to their business.

Staff Awareness

The Firm has implemented a Slavery and Human Trafficking Policy which sets out the Firm's stance in relation to modern slavery and human trafficking and its processes and procedures for minimising the risk of slavery and human trafficking in its own work force and supply chains. A reminder of the Firm's policy is communicated each year when our statement is published.

The Firm has also previously provided in-person training to those in the business who either deal with suppliers or the recruitment of staff. The firm also operates an effective Whistleblowing Policy. Training in the form of a guidance note on modern slavery was circulated to the entire firm in May 2020. Further training will take place in 2022/2023.

Responsible Business Strategy

As part of the firm's Responsible Business Strategy, the firm has employed a Responsible Business Manager. During 2022/2023 we will be considering our supplier process to include the implementation of a Supplier Code of Conduct to ensure that our suppliers meet all legal and regulatory obligations (including obligations under the Act) as well as adhere to our ethical standards.

Responsibility

It is the responsibility of the General Counsel to ensure adherence to the Slavery and Human Trafficking Policy.

C A Emden

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Craig Emden
Managing Partner