

Travers Smith Modern Slavery Act Statement

Our aim is to provide the very highest quality of service whilst ensuring that our business is conducted in an ethical way. We will not tolerate any abuse of human rights within our business or supply chain.



December 2024

As lawyers, we recognise our responsibility in promoting the rule of law. We achieve this by continually reviewing and updating our own working practices and helping our clients to succeed in an increasingly regulated and transparent commercial environment. Through our advice, we seek to support clients in operating in a compliant and ethical manner.

BACKGROUND

Travers Smith LLP is one of the UK's leading independent law firms. We provide English law advice to a range of UK and international clients. Our main office is in London, and we have a branch office in Paris.

The firm operates as a limited liability partnership and is owned by our partners. Our Partnership Board makes management decisions on behalf of the firm. This statement is published on behalf of Travers Smith LLP in line with the Modern Slavery Act 2015 ("MSA"), and references to "we", "us", "our" or the "firm" are to that entity.

OUR SUPPLY CHAIN

As a professional services organisation that is office-based, we consider the risk of modern slavery, servitude, or human trafficking existing within our business to be relatively low, although we acknowledge that the risk is greater in our supply chain. The goods and services that we procure to enable the delivery of our legal services relate primarily to professional services, property services, facilities management and maintenance, catering, and information technology.

To seek to minimise the risk of modern slavery, servitude, or human trafficking occurring in our supply chain, we adopt a risk-based approach which seeks to evaluate key suppliers, using a bespoke procurement checklist, before we contract with them. Our objective is to establish and maintain collaborative relationships with our suppliers, so that we can properly understand any potential modern slavery issues facing them, and work with them to manage and address such risks.

Our [Supplier Code of Conduct](#) which is published on our website (the "Code") is reviewed annually and we look to incorporate it into our contracts with suppliers. The Code clearly outlines the standards we expect of our suppliers when conducting business. This includes compliance with social and ethical responsibilities and applicable laws, as well as the implementation of steps to identify and address material human rights issues, including modern slavery concerns.

We expect our suppliers to operate fair and ethical workplaces. Whilst our goal is to work with suppliers to ensure that they understand and can implement the expectations set out in the Code, we reserve the right to end commercial relationships where suppliers do not achieve, or are unable to demonstrate progress towards, the Code's requirements.

To assist us in assessing both potential and existing key suppliers from a sustainability perspective, since 2022 we have been working with EcoVadis. An ESG ratings provider to provide independent ESG insights via an evidence-based supplier assessment. We are currently monitoring a portfolio of 73 suppliers on EcoVadis, including over 80% of our strategic supply chain spend. Through the EcoVadis platform, we are also able to review key supplier policies and actions in key areas, whilst we utilise the media monitoring functionality to keep up to date on supplier news related to human rights. For suppliers where the EcoVadis platform indicates an area of poor performance, we conduct further reviews and work with suppliers to support improvement. As a firm we will continue to monitor responses to EcoVadis, look to improve participation, and take appropriate action where necessary.

PRACTICES AND PROCEDURES

As part of our wider commitment to promoting ethical business practices, we have in place a variety of policies and procedures that together address our approach to these issues:

- Anti-Bribery and Corruption Policy
- Speak Up Policy
- New Business Acceptance Protocol
- Harassment, Sexual Harassment and Bullying Policy
- Grievance Policy
- Domestic Abuse Policy
- Equality and Diversity Policy
- Health and Safety Policy
- Environmental Policy
- WorkInConfidence (an anonymous online communications platform for reporting concerns)

We recognise the importance of continually improving our practices and procedures to ensure efficient ways of working and alignment with the latest industry standards. Last year we introduced our Responsible Procurement Strategy, and we regularly make additions and amendments to the above policies and to our Code. In 2025 we will be launching an industry-standard Supplier & Contract Management system to improve our ability to proactively manage third-party supplier risk.

We are an accredited member of the London Living Wage Foundation and all contracts relating to individuals working on our behalf, whether engaged directly or subcontracted by our suppliers, contain a clause ensuring they receive, as a minimum, the London Living Wage.

More generally, the firm is fully committed to promoting CSR. For more information on our CSR programme, please visit the [Corporate Social Responsibility](#) page on our website.

IMPLEMENTATION

Together, our Sustainability Manager, Senior Management Team and Environment Committee take responsibility for implementing and monitoring progress against our MSA objectives. Our Risk and Compliance and Procurement teams are responsible for ensuring that we work with suppliers who are aligned with our values.

Our MSA statement has been, and will continue to be, posted on the UK Government's Modern Slavery Database.

MONITORING AND REPORTING

If we become aware of an instance of modern slavery or human trafficking occurring in any of our supply chains, we will work to resolve the issue through legitimate and proportionate procedures. We have procedures in place which are designed to ensure any issues identified by a supplier in relation to modern slavery should be immediately reported to our Sustainability Manager.

In addition, our Speak Up and Grievance policies are communicated to everyone at the firm by way of internal news stories. The policies are also published on our intranet. These encourage people to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

More general issues arising in relation to the points outlined in this policy can be reported to the Environment Committee (for internal purposes) or the Sustainability Manager (where an issue is identified by a supplier).

TRAINING

New starters receive training on slavery and human trafficking as part of their induction programme. In addition, targeted slavery and human trafficking training sessions are provided to those managing supplier contracts where necessary in order to educate them on the importance of implementing and enforcing effective systems to prevent slavery and human trafficking from taking place in our supply chains. A training hierarchy has been developed to ensure that, where there is the potential for greater risk of slavery and human trafficking (e.g. whether due to sector or the jurisdiction in which suppliers or other associated third parties are based), specific internal training is provided to equip people with the skills to effectively assess and manage that risk. To enhance our training and awareness programme we are developing a new training video for publication on our intranet, for all to reference as and when the need arises.

In addition to training our own people, we support a number of clients and industry bodies more generally on the challenges posed by slavery, human trafficking and human rights abuse and compliance with the MSA. Our latest [legal briefings](#) can be found on our website.

BOARD APPROVALS

Travers Smith LLP Partnership Board approved this statement on 11 December 2024.



Managing Partner
Travers Smith LLP

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our firm's slavery and human trafficking statement for the financial year ended 30 June 2024.

Next Review: December 2025

FOR FURTHER INFORMATION, PLEASE CONTACT



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