



Modern slavery and human trafficking statement

October 2024

A statement from the Managing Partner

This statement is made on behalf of Reynolds Porter Chamberlain LLP and its affiliated entities (as listed below) (RPC), in accordance with the requirements of Section 54 of the Modern Slavery Act 2015 (the Act) for the financial year ending 30 April 2024.

RPC is a global law firm recognised as leaders in markets ranging from retail to insurance, technology to media. We have a global staff count of over 1,130 people, comprising 140 Partners and over 380 lawyers (excluding Partners).

RPC is opposed to all forms of modern slavery and human trafficking. It has a severe impact on the individuals subjected to it and on wider society generally. RPC recognises that this is a global issue and takes steps to ensure its policies and controls are implemented across all its offices worldwide.

RPC is committed to adhering to the strictest ethical behaviour and standards in all our business dealings. We recognise

that we have a moral duty to do all we can to act transparently in this area and we work to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We strive to raise awareness of modern slavery issues generally through our various workstreams, initiatives and training both internally and externally and aim to conduct all our business dealings in an ethical and transparent manner.

This statement is designed to provide an overview of our business, our supply chains and is intended to detail our policies and procedures used to combat modern slavery and human trafficking.

Statement

This statement was approved by the RPCs' Partnership Executive Board on behalf of the firm on 31 October 2024.




James Miller, Managing Partner

Reviewed and revised: 31 October 2024

Next review by: 31 October 2025

Our business

RPC provides a broad range of legal services from its offices in the UK, Hong Kong and Singapore through the following entities:

REYNOLDS PORTER CHAMBERLAIN LLP (trading name RPC) is a limited liability partnership registered in England and Wales with registered number OC317402. Its registered office address is Tower Bridge House, St Katharine's Way, London, E1W 1AA, UK. Reynolds Porter Chamberlain LLP is a law firm authorised and regulated by the Solicitors Regulation Authority (the SRA) and is authorised to practise the law of England & Wales. Its SRA ID number is 440566.

REYNOLDS PORTER CHAMBERLAIN (trading name RPC) is a Partnership registered in Hong Kong. Its address is 3802-06, 35/F One Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong. Reynolds Porter Chamberlain is a law firm registered with and

regulated by The Law Society of Hong Kong and is authorised to practise the law of Hong Kong and of England and Wales.

PREMIER LAW LLC (trading name Premier Law) is a limited liability law corporation incorporated in Singapore under Unique Entity Number 200723397D. Its registered address is 12 Marina Boulevard, #38-04 Marina Bay Financial Centre Tower 3, Singapore 018982. Premier Law LLC is regulated by the Singapore Ministry of Law, the Legal Services Regulatory Authority of Singapore, and the Accounting and Corporate Regulatory Authority of Singapore and is authorised to practise Singapore law.

RPC PREMIER LAW PTE LTD (trading name RPC Premier Law) is a limited liability private company incorporated in Singapore under Unique Entity Number 201605186H. Its registered address is 12 Marina Boulevard, #38-04 Marina Bay Financial Centre Tower 3, Singapore 018982. It is a joint law venture between Reynolds Porter Chamberlain LLP and Premier Law and operates as a law firm. RPC Premier Law Pte Ltd is regulated by the Singapore Ministry of Law, the Legal Services Regulatory Authority of Singapore, and the Accounting and Corporate Regulatory Authority of Singapore and is authorised to practise Singapore law in permitted areas of legal practice.

Our supply chains

The supply chains RPC uses to provide its services primarily relate to:

- professional and business services
- technology
- facilities management
- maintenance and catering.

All RPC suppliers are expected to implement a zero-tolerance approach to modern slavery and human trafficking. This is covered in more detail within the due diligence section and includes information on the Code of Conduct suppliers are required to sign before any services are provided.

In the last 12 months, we have had no reported incidents of slavery or trafficking from our staff or suppliers.

Risk assessment

We consider the risk of modern slavery occurring in each of the jurisdictions in which we operate with reference to publicly available sources and based our own knowledge and experience.

Given the sectors in which we operate, RPC considers its directly employed staff to be relatively low risk in relation to the potential for modern slavery and human trafficking.

In relation to its supply chain, RPC considers there is a slightly higher risk in relation to the potential for modern slavery and human trafficking. However, it is still considered to be low risk overall.

To address the risks of modern slavery occurring in our supply chain, we aim to ensure that we only work with suppliers who align with our principles of acting

with integrity, ethical behaviour and those who have a strong commitment to human rights, as set out below.

Due diligence

RPC has a centralised process for supply chain management which will consider the risk profile of all new key suppliers to its businesses and will look to either:

- review that supplier's modern slavery statement (where they are required to have one) and/or code of conduct
- ask the supplier to sign up to RPC's supplier code of conduct.

We also continually review our supplier onboarding processes and will, on a risk-based approach, increase our due diligence for higher-value contracts and higher-risk rated suppliers. This may include enhanced due diligence where there are reputational risks/concerns and where deemed necessary we will incorporate specific contractual compliance confirmations which will include Modern Slavery and other related ethical issues. For suppliers who access our data and/or premises and/or systems we will require them to complete a set of compliance questions and confirm their procedures in ensuring those in their own supply chain are not involved in modern slavery or human trafficking.

In relation to modern slavery and human trafficking, RPC's supplier code of conduct requires that its suppliers:

- always act to the highest standards of honesty and professionalism and undertake their business ethically and with integrity

- demonstrate a commitment to equality of opportunity, diversity, and inclusion in the way they conduct business and manage their staff and always act in a socially responsible manner. All staff should be treated with respect and protected from harassment, discrimination, victimisation, unfair treatment and abuse. This should be supported by regularly reviewed internal policies, monitoring and workforce training
- not use any form of forced or involuntary labour and comply with the Modern Slavery Act 2015 or any other relevant local law pertaining to such practices
- implement working hours and pay staff wages which are compliant with relevant laws, including (but not limited to) in relation to minimum wage, equal pay and maximum working hours
- provide their staff with mechanisms and processes to raise workplace concerns and comply with all relevant labour and employment laws. Respond to any such concerns raised in a timely and appropriate manner.

If a supplier does not meet RPC's standards and requirements, we will consider whether it is appropriate to work with them and, where necessary, either help them address and remedy those issues or where more appropriate take steps to terminate contracts.

As part of our process of continuous improvement, in March 2024 we reviewed and updated our supplier code of conduct to ensure it continues to reflect best practice in this area. Updates to our policies and procedures reflect changes in regulations and are in line with our risk assessments. We have enhanced our due diligence processes over the 12 months which has further reinforced the assurances we seek from our suppliers, including in relation to the management of their supply chains to ensure they are not involved with modern slavery.

We are continuing to develop our review process for supplier due diligence and are now working collaboratively with our internal Anti Money Laundering team (**AML team**) who have experience in research of companies as part of their wider Client Due Diligence (**CDD**) checks. The additional benefit of working with the AML team is the access to wider resources they have at their disposal, and their ability to interrogate and report on this information in a concise way which ensures that any concerns identified are quickly escalated.

Our policies

In addition to due diligence on suppliers, RPC has a number of policies and procedures which are relevant in relation to modern slavery and human trafficking. These policies set out our commitment to acting ethically and with integrity in all our business dealings. These policies include:

- Modern Slavery Policy
- Anti-Bribery and Corruption
- Gifts and Hospitality Policy
- Whistle-blowing Policy.

RPC encourages a "speak up" culture. All staff are encouraged to report any actual or suspected breaches of RPC's policies and procedures in confidence and where such reports are made these will be investigated by a senior member of the firm with involvement from key stakeholders as required.

Training

All RPC staff have access to an online learning platform called AmP Learn which provides firmwide training on all mandatory compliance areas. This includes specific training on modern slavery on a periodic basis. It is anticipated that all staff will be provided with further mandatory training on modern slavery in Q4 2024.

The internal training platform was replaced in 2023 which has seen an increase in the availability of training and guidance materials available to staff. In addition, RPC staff also have access via the firm's intranet to wider reading resources such as the Home Office's guidance on modern slavery. This guidance centralises key documents and promotional material related to the Government's work to end modern slavery.

RPC raises awareness of the need for modern slavery compliance in business support teams by ensuring that the supplier code of conduct is a key part

of our onboarding processes and encouraging initiatives designed to ensure that its supply chains are free from modern slavery and human trafficking.

RPC also makes available to its staff a staff assistance programme (including an independent confidential 24/7 helpline), which can be used by its staff for free and confidential advice in relation to workplace concerns or issues.

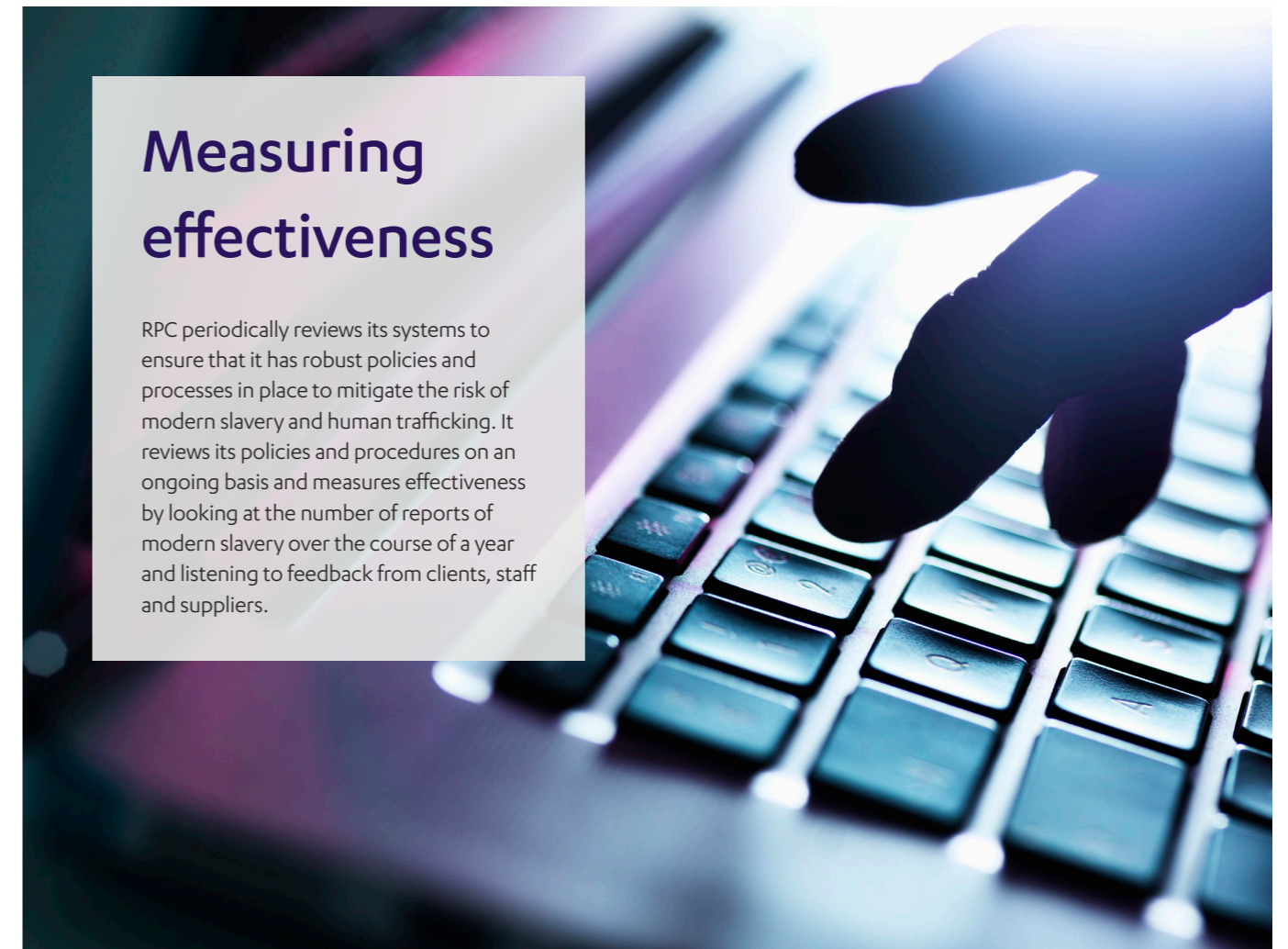
RPC also has a well-established Modern Slavery Steering Group (**MSSG**) which was launched in 2021 with its aim to raise awareness and increase the profile of

modern slavery and human trafficking issues. The steering group comprises members of varying levels and is chaired by a member of the Partnership Executive Committee (**PEX**).

The MSSG and Employment team colleagues are supporting the firm's commercial clients more in this area of law, advising a number of large clients on their own modern slavery statement obligations.

Measuring effectiveness

RPC periodically reviews its systems to ensure that it has robust policies and processes in place to mitigate the risk of modern slavery and human trafficking. It reviews its policies and procedures on an ongoing basis and measures effectiveness by looking at the number of reports of modern slavery over the course of a year and listening to feedback from clients, staff and suppliers.



Our own business initiatives and actions taken up to FYE April 2024

The MSSG has continued to meet every 2-3 months to focus on internal awareness raising. Members of the MSSG will, periodically circulate commercial awareness updates to relevant stakeholders. Any key issues highlighted are discussed when appropriate with other members of PEX to ensure everyone remains up to date on the position.

We also continue to increase the opportunities for using our own standard terms and conditions of purchase with our suppliers which include enhanced compliance requirements. We strive to use our standard terms wherever appropriate and otherwise seek to embed enhanced compliance clauses into our higher-risk supplier contracts wherever possible.

Charity and Pro-bono work:

RPC collaborates and supports different purposes and charities that raise awareness regarding the issue of modern slavery, aiming to strengthen the knowledge around the issue within the firm and externally. Some examples of this work are provided below:

Hestia: Members of the MSSG have developed an informal partnership with the London and South East charity Hestia which supports survivors of modern slavery and domestic abuse by providing safehouse, awareness-raising activities and workshops to empower victims of modern slavery. As part of this partnership, RPC hosted Hestia's Empowered Voices network, which is made up of current and ex-Hestia

clients who are supported by Hestia's Modern Slavery Response Team. In March members of MSSG supported Hestia's International Women's Day event designed to upskill and support vulnerable women that the charity supports. There are further events planned during the FY24/25.

Unseen: RPC provides pro-bono services to Unseen, a UK charity which provides safehouse and support to survivors of trafficking and modern slavery and runs the UK Modern Slavery & Exploitation Helpline.

Justice Without Borders: RPC assists Justice Without Borders in Hong Kong and Singapore to provide legal advice and

services to victims of labour exploitation and human trafficking. We also provide ad hoc training and legal support to migrant workers who face challenges accessing the justice system.

Liberty Advice Line: RPC supports Liberty Advice Line, an independent membership organisation and human rights campaign group that works to challenge injustice and protect civil liberties. Our lawyers volunteer to help run Liberty's weekly Advice Line – a service that offers free advice to members of the public on human rights and related issues including privacy concerns and employee rights.

Plans for the year to FYE April 2025

RPC considers that its approach to modern slavery and human trafficking issues will evolve on a continuous basis, proportionate to its risks.

We intend to continue developing our procurement and audit processes over the coming financial year and we will continue to develop and improve our contractual processes, including implementing enhanced due diligence, using a risk-based approach.

While we consider our directly employed staff to be relatively low risk in relation to the potential for modern slavery and human trafficking, and we take steps to minimise the risk in our supply chain, we are well aware that vigilance needs to be maintained. It is for this reason, we continue

to discuss modern slavery and human trafficking issues with our ESG workstream, look at relevant pro-bono opportunities and continue to work with the number of charities we have partnered with whilst also exploring other partnerships to help to continue to raise awareness.

