

A person's silhouette is shown from the back, looking towards a wall of colorful bokeh lights. The lights are in shades of yellow, orange, red, pink, and purple, creating a vibrant, out-of-focus background. The person is wearing a dark jacket.

RPC

# Modern slavery and human trafficking statement

FYE OCTOBER 2023

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 2023.



## Statement from the Managing Partner

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 1000 people, comprising 131 partners and over 480 lawyers.

RPC is opposed to all forms of modern slavery and human trafficking. It has a severe impact on the individuals subjected to it and for 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 of our business dealings. We recognise that we have a moral duty to do all we can to act transparently in this area and to try 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 both internally and externally and aim to conduct all of our business dealings in an ethical 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.



# Our business

**RPC provides a broad range of legal services from its offices in England, 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, United Kingdom. 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, 38/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.

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

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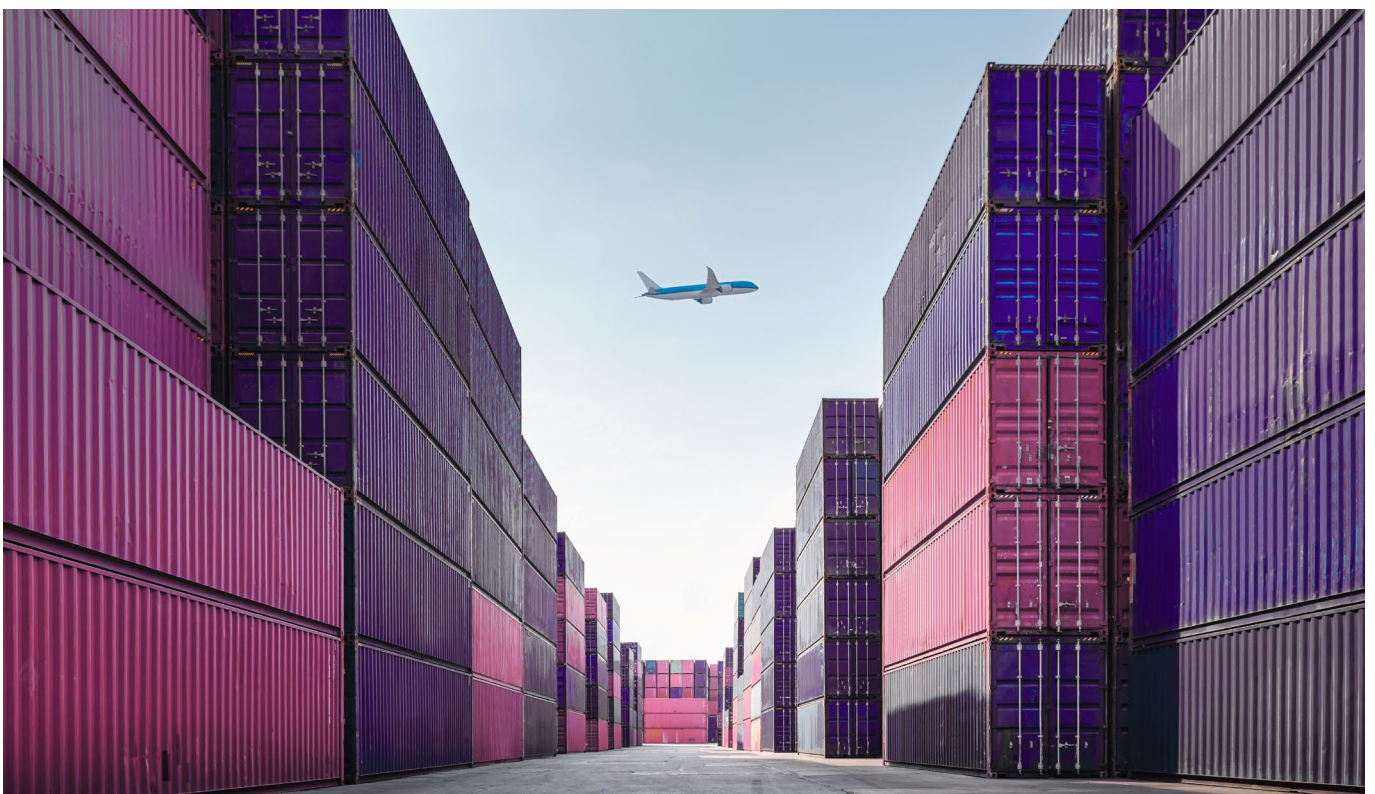
# Risk assessment

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

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 to 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 considers the risk profile of all new key suppliers to its businesses and looks to either:

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

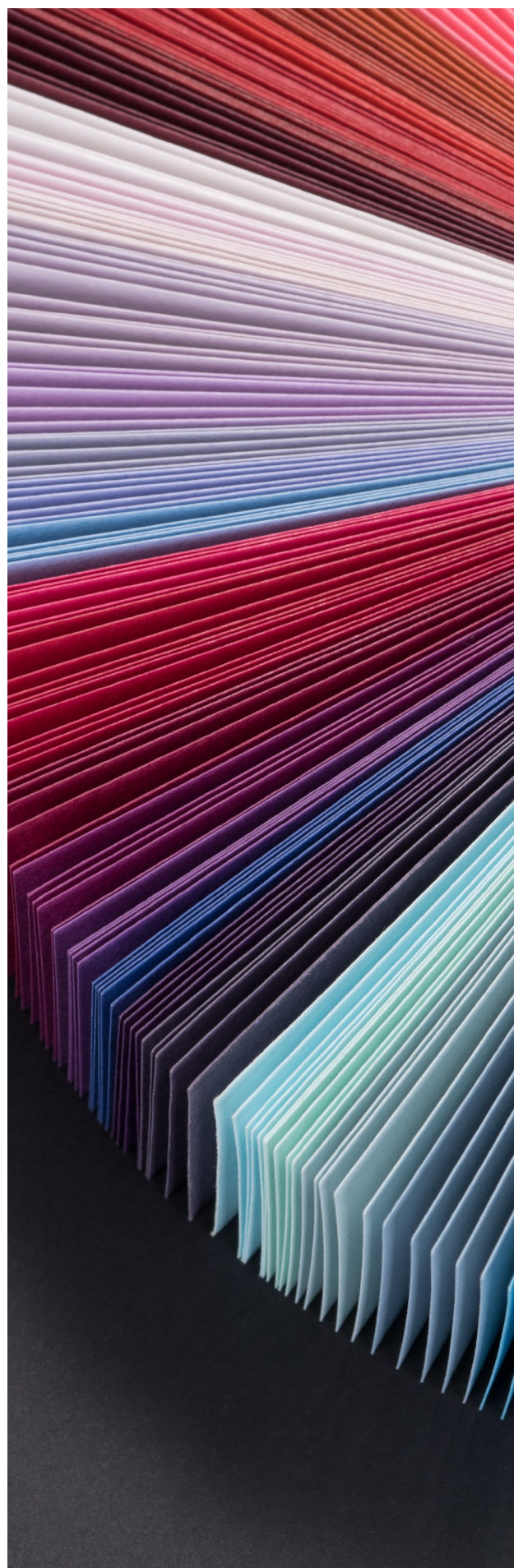
We also continually review our supplier onboarding processes and will extend due diligence requirements for higher value contracts and higher risk suppliers which may, where possible, include specific contractual compliance confirmations, including in relation to Modern Slavery.

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 and abuse
- not use any form of forced or involuntary labour and comply with the Modern Slavery Act 2015 or any other relevant local law
- implement working hours and pay staff wages which are compliant with relevant laws
- provide their staff with mechanisms to raise workplace concerns and comply with all relevant labour and employment law

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

As part of our process of continuous improvement, in January 2023 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.



## 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:

- a Modern Slavery Policy
- an Anti-Bribery and Gifts and Hospitality Policy and
- a 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 which provides information and training on modern slavery compliance on a periodic basis. The training platform has recently been upgraded which has seen an increase in training and guidance materials available to staff. In addition, RPC staff also have access via the firm intranet to wider reading resources such as the Home Office’s guidance on Modern Slavery. This guidance brings together 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.

During FY2023, members of RPC’s Modern Slavery Steering Group (**MSSG**) completed further online training, which looked specifically at modern slavery issues in the UK. Our MSSG was formally launched in 2021 with a view to raising awareness and increase the profile of modern slavery and human trafficking issues. The steering group is comprised of members of varying levels and is chaired by a member of the Partnership Executive Committee (**PEX**).

## 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 2023

The MSSG continue to meet every 2-3 months to focus on internal awareness raising. Members of the MSSG arranged a charity Three Peaks challenge which involved participants from varying levels from within the firm to raise money for Unseen (an anti-slavery charity which aims to work towards a world without slavery). This has further contributed to the awareness raising of the issue of modern slavery both within the firm and via our social media platforms.

During FY2023 we continued our review of modern slavery risks in relation to specific external contractors who come on site to provide services where the risks to modern slavery could be potentially increased to RPC, including our cleaning supplier and caterers who were asked to complete a updated modern slavery questionnaire.

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 own standard terms wherever deemed appropriate and otherwise seek to embed enhanced compliance clauses into our higher risk supplier contracts wherever possible.

Our Asia offices continue to work extensively with Justice Without Borders (**JWB**) on a pro bono basis. JWB is a Hong Kong registered charity which focuses locally and regionally on cross-border civil litigation for migrant workers who have been victims of labour exploitation or human trafficking. We have worked with JWB to ensure that access to legal assistance continues to be an option for vulnerable migrant workers, even after they return home, advising individual workers on criminal, civil and immigration issues.



# Plans for the year to FYE April 2024

**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.

Whilst 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 aware that modern slavery remains a pressing issue. 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 JWB in Asia, helping to provide justice for migrant domestic workers and to support JWB as an organisation.



# Statement

This statement has been approved by RPC's partnership executive board on behalf of the firm on 27 October 2023.

A handwritten signature in black ink that reads "James Miller". The signature is written in a cursive, flowing style.

**James Miller**, Managing Partner

Reviewed and revised: 27 October 2023

Next review: 27 October 2024

