

Modern Slavery and Human Trafficking Policy

1. Policy Statement

- 1.1 Modern Slavery comes in various forms but in all forms it has the common feature of one person depriving another of his or her liberty in order to exploit that person for commercial or personal gain. The term Modern Slavery is also used to denote human trafficking which includes the acts of recruiting, transporting, transferring, harbouring or receiving a person, through any coercive means for the purpose of exploitation. In all its forms, Modern Slavery is a violation of human rights and is illegal, but we as a firm are conscious that it continues to occur across the world, including in the UK.
- 1.2 It is important to us that we are “Doing The Right Thing” where ever we operate. Our goal is to implement systems which will ensure that Modern Slavery is not taking place anywhere in our business and that those with whom we do business never benefit from or in any way contribute to Modern Slavery.
- 1.3 The objective of the systems, which we continue to develop, are to ensure that everyone who works for and does business with us upholds and acts in accordance with the same principles. In particular, everyone who works for and does business with us must avoid any activity that might amount to, or lead to, a breach of this Policy.
- 1.4 This Policy applies to all who work at Reed Smith and anyone who has a business relationship with Reed Smith.
- 1.5 We endeavour to communicate our Policy and the means to report breaches to all suppliers, contractors and others with whom we do business at the outset of any business relationship and remind them of our approach, when appropriate. We may terminate our relationship with any person or organisation who does not comply with this Policy.
- 1.6 All who work at Reed Smith can access this Policy and guidance on the dedicated Modern Slavery page ([see page here](#)). We also regularly provide training on this Policy.
- 1.7 A breach of this Policy by an employee of Reed Smith will be considered under the firm’s misconduct procedures and, if a serious breach, could be a treated as gross misconduct, which might result in dismissal without notice.

2. Reporting breaches of this Policy

- 2.1 It is the responsibility of all of us to detect and report any incident of Modern Slavery. Any suspicion of Modern Slavery or other issues which could be a breach of the Policy should be raised at the earliest opportunity. If you are unsure whether a particular act or treatment by a Reed Smith partner, employee or supplier might constitute Modern Slavery, please raise it for further consideration by the firm.
- 2.2 Reports can be made to any member of the Legal Department or Office Managing Partner. In addition, reports can be made confidentially and, if requested, anonymously, to the Reed Smith Ethics Hot Line that is managed by an independent organisation EthicsPoint, Inc: Please see a link to EthicsPoint, [here](#). Any report made to EthicsPoint, will have its confidentiality and anonymity protected to the fullest extent possible. EthicsPoint is currently used by more than 2,400 organisations internationally.
- 2.3 To report a potential breach to EthicsPoint by phone, use one of the numbers that can be accessed on the EthicsPoint page or, if you do not feel comfortable using the phone, a web intake method can be used by going to the [EthicsPoint website](#). Reports are entered directly on the EthicsPoint secure server to protect against a breach of security.
- 2.4 Reed Smith Ethics Hot Line Numbers for each Reed Smith office location can also be found on the [EthicsPoint website](#).

3. Policy Ownership and Revision

- 3.1 The Legal Department will maintain responsibility for this Policy.
- 3.2 This Policy was originally published in October 2016 and revised in March 2019, March 2020, March 2021, and December 2021. This Policy will be subject to review by the Legal Department at periodic intervals.