

Modern Slavery Act statement

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 (MSA) and shall be reviewed annually by the Risk Committee.

Our firm

Harbottle & Lewis is a leading UK-based law firm and a limited liability partnership registered in England and Wales with registered number OC304954 and registered office, 7 Savoy Court, London, WC2R 0EX, United Kingdom. It is a law firm authorised and regulated by the Solicitors Regulation Authority of England and Wales.

As a law firm providing professional services, the firm predominately employs professionally qualified lawyers. In our office we also employ staff who provide administrative, facilities and business services. Our supply chain consists of suppliers who provide goods and services to us to enable the firm to deliver these professional services. Most goods and services the firm procures are based in the UK. The main categories of goods and services that we procure both directly and indirectly are:

- Information and communications technology (ICT): which includes computer hardware and software, cloud services and printers, online subscriptions, and mobile phones.
- Professional services: such as external advice or legal counsel, foreign legal counsel, barristers, forensic experts, consulting services and training programs.
- Workplace services: such as stationary, office fit outs, leasing, office management, utilities, cleaning, and security.
- Hospitality and catering: catering on-site and for events, venue providers and branded merchandise.

Our values and approach

We are aware of the economic, social and environmental impact of our activities as a firm and our resulting moral responsibility to society. We are committed to making a positive contribution in all these areas and encourage all our people to play an active part in being a socially responsible firm. We actively seek to promote ethical values and behaviour within our business, and our Modern Slavery Act Statement reflects these principles with a commitment to conduct all our business relationships with ethical principles.

Modern slavery – Code of Conduct

The firm has a zero-tolerance approach towards any form of slavery, servitude, forced or bonded labour, or human trafficking (collectively referred to as 'modern slavery' in this statement) and is committed to taking steps to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We will not support any arrangement or relationship that is knowingly involved in modern slavery. We are committed to ensuring that there is no modern slavery in our business or in our supply chains, and to acting ethically and with integrity in all our relationships.

We consider the firm to be relatively low risk in relation to modern slavery, given the sector in which we operate. Our current practices in relation to combating modern slavery are set out below.

Procurement

We apply the highest possible standards in the recruitment and employment of our people. We conduct due diligence on our prospective employees prior to them joining.

All our staff are expected to comply with relevant laws and professional codes of conduct, as well as our Whistleblowing Policy, and other policies and procedures.

We are an Accredited Living Wage Employer, meaning that we have committed to pay all our employees a fair living wage.

As part of the firm's supplier onboarding process, we perform due diligence across a range of relevant areas.

We have taken the following steps to assess and make sure that our main suppliers all have modern slavery policies and adhere to the Act:

- We request all suppliers to implement the principles in the Modern Slavery Act 2015 (MSA) and comply with the principles as set out in our Modern Slavery Statement.
- We have reviewed all current suppliers to ensure they do so.
- We also request that all suppliers impose these principles on their respective suppliers.
- When entering arrangements with suppliers, they complete a supplier approval questionnaire in which we assess their ethical values and behaviour and ensure that the suppliers have adequate policies in place in respect to enforced labour.

Our due diligence process allows us to interrogate our suppliers' modern slavery policies and practices, and an expectation their processes are as stringent as ours as a minimum.

We have a procurement team in at which risk concerns can be raised and addressed to the Risk Committee.

We review our approach to such matters on a regular basis.

We have a pro-forma letter of engagement for instructing a third-party professional, such as an expert or a foreign lawyer. In this pro-forma letter, we require the third-party professional to warrant that they comply with labour, anti-slavery and human trafficking laws, including but not limited to the UK Modern Slavery Act, and that any subcontractor used by the third-party professional in relation to the engagement does likewise.

We organise training on modern slavery that must be completed by key individuals who we have identified as dealing with any aspect of procurement on behalf of the firm.

Effectiveness and key priorities

- We shall be including training on modern slavery as part of the induction pack that is given to employees when they join the firm, and training is provided as necessary.
- The Procurement Team will continue to monitor our supply chains to identify any risk of slavery and human trafficking and will provide any concerns to the Risk Committee and where we identify new suppliers as being at risk and such suppliers do not have slavery and human trafficking statements, we will continue to seek appropriate assurances from those suppliers that: i) there is no slavery or human trafficking in any part of their business; and ii) they are taking active steps to ensure that there is no slavery or human trafficking in any part of their supply chains.
- We will provide compulsory training to a targeted cross-section of our personnel on slavery and human trafficking but also include training in all our personnel in teams who have responsibility for liaising with recruitment agencies and procuring goods and services.
- We will continue to monitor government guidance and reports regarding the Modern Slavery Act 2015, particularly in relation to amendments to applicable legislation and additional government guidance and consider updates to our internal procedures considering such amendments and information.

Last reviewed: November 2025