



# Morgan Lewis

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

For financial year ending 30 September 2018

## INTRODUCTION

This statement sets out the actions of Morgan, Lewis & Bockius UK LLP and Morgan, Lewis & Bockius LLP (collectively “Morgan Lewis” or “the firm”) to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the legal profession, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Morgan Lewis is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

## ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Morgan Lewis provides comprehensive litigation, corporate, finance, restructuring, employment and benefits, and intellectual property services in all major industries, helping clients address and anticipate challenges across vast and rapidly changing landscapes. Our teams of lawyers are organised into 17 practice specialty areas across 31 offices worldwide. Our practice areas include antitrust, corporate and business transactions, eData, employee benefits, energy, FDA, finance, intellectual property, investment management, labour and employment, litigation, Morgan Lewis Consulting, personal law, tax, structured transactions, telecommunications, media and technology, and Washington Government Relations and Public Policy.

### Countries of Operation and Supply

Morgan Lewis has 31 offices in North America, Europe, Asia, and the Middle East. The firm is a registered limited liability partnership under the laws of the Commonwealth of Pennsylvania. The firm has approximately 730 individual partners with each partner owning less than 1% of the firm. The firm has operations in various cities throughout the United States as well as internationally. The firm’s international operations are structured as either branch offices or subsidiaries of wholly-owned companies. The firm is organised in the United Kingdom as a limited liability partnership authorised and regulated by the Solicitors Regulation Authority. The Paris office is a branch of the UK LLP. The firm also, from time to time, works with local counsel in many jurisdictions in order to satisfy our clients’ requirements and instructions.

### Risk Assessment to Identify High-Risk Activities or Jurisdictions

Morgan Lewis has adopted a risk-based approach to assess against the risk of modern slavery within its supply chain. The criteria used in this approach includes the nature and location of the services provided and the identification of any red flag indicators.

# RESPONSIBILITY

Responsibility for the firm's anti-slavery initiatives, including implementation and subsequent review of policies and the carrying out of risk assessments in respect of the risks associated with modern slavery lies with the Head of Risk and Compliance. This responsibility has been delegated to her by the Compliance Officer for Legal Practice. The Head of Risk and Compliance will hold responsibility for carrying out any investigations and due diligence in relation to known or suspected instances of slavery and human trafficking involving Morgan Lewis or its supply chain.

Morgan Lewis has made training available to all its employees on modern slavery and will require compulsory completion on an annual basis. We have adopted a Modern Slavery Policy, setting out the firm's approach to tackling the threat and risks.

# RELEVANT POLICIES

The firm operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** the firm encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the firm. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The firm's whistleblowing procedure is designed to make it easy for individuals to make disclosures, without fear of retaliation.
- **Morgan Lewis Code of Business Conduct:** the firm's code makes clear to employees the actions and behaviour expected of them when representing the firm. The firm strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Outsourcing Policy:** the firm is committed to ensuring that its suppliers adhere to the highest standards of ethics. We are in the process of making appropriate changes to the policy to address the specific risk of modern slavery. Suppliers will be required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The firm will work with suppliers to ensure that they meet the requirements of the legislation.

# DUE DILIGENCE

The firm undertakes due diligence when considering taking on new suppliers and the process of review of its existing suppliers is ongoing. The firm's due diligence and reviews include, or will include in the future, reviews:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on an annual basis all aspects of the supply chain based on the supply chain mapping;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and if necessary requiring them to implement action plans;
- conducting due diligence on all suppliers paying particular attention to their labour standards, compliance in general, and modern slavery and human trafficking policy in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

# PERFORMANCE INDICATORS

The firm has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the firm:

- requires all staff to have completed training on modern slavery;
- will develop a robust system for supply chain verification whereby the firm evaluates potential suppliers before they enter the supply chain; and
- has reviewed its existing supply chain, evaluating all existing suppliers. This involved seeking declarations from all suppliers about their own strategy of combatting modern slavery and challenging any noncompliance.

# TRAINING

The firm requires all staff to complete training on modern slavery as a module within its wider risk and compliance training programme.

This covers:

- how to assess the risk of slavery and human trafficking, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the firm;
- what external help is available; and
- what steps the firm should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the firm's supply chains.

# AWARENESS-RAISING PROGRAMME

A particular focus is on training those employees within business services who are regularly involved with the firm's supply chain and Suppliers.

This statement has been approved by Frances Murphy, London Office Managing Partner, who will review and update it annually.

**Frances Murphy, Managing Partner**

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