



RPC



# Modern slavery & human trafficking statement

FYE April 2021



# A statement from the Managing Partner



**RPC is a global law firm and recognised as leaders in markets ranging from retail to insurance, technology to media. We have a global staff count of over 800 people, comprising over 100 partners and over 270 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 steps should be taken to combat it both at home and abroad.

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 made on behalf of Reynolds Porter Chamberlain LLP and its affiliated entities which provide legal services, pursuant to s.54 of the Modern Slavery Act 2015 (the Act) for the financial year ending 30 April 2021. It 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.

This statement was reviewed and approved by RPC's Partnership Executive Committee on behalf of the firm on 26 August 2021.



# Our business

RPC provides legal services in England, Hong Kong and Singapore through the following entities:

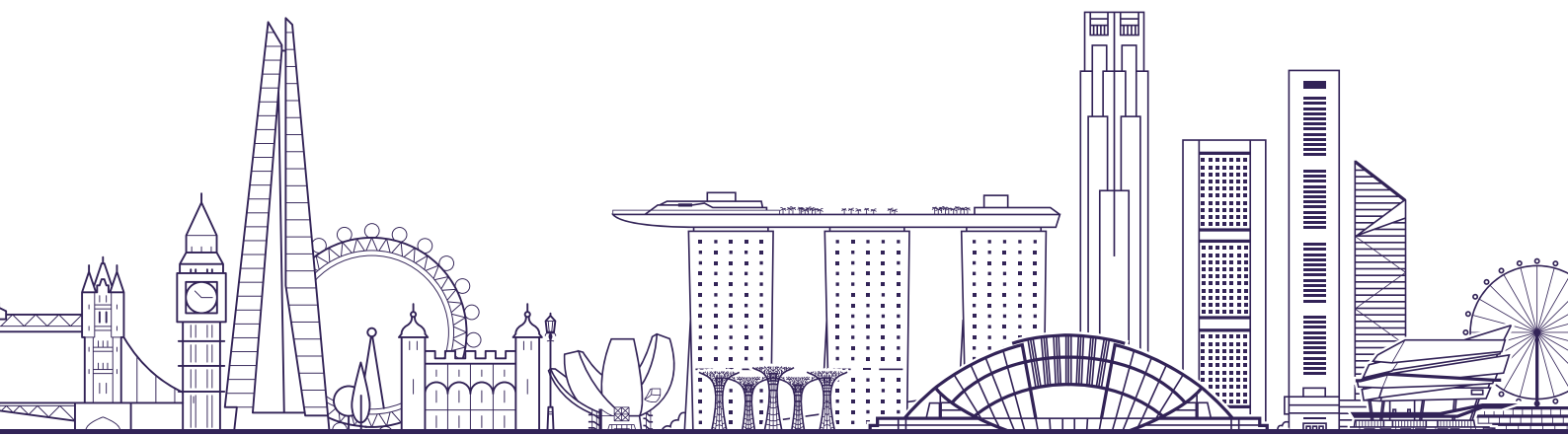
**REYNOLDS PORTER CHAMBERLAIN LLP** (trading name RPC) is a limited liability partnership registered in England and Wales with registered number OC317402. Its registered office address is Tower Bridge House, St Katharine's Way, London, E1W 1AA, United Kingdom. Reynolds Porter Chamberlain LLP is a law 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) 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) 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.

References to "RPC", "we", "us", "our", or the "firm" are references to both Reynolds Porter Chamberlain LLP and the entities listed above.



# 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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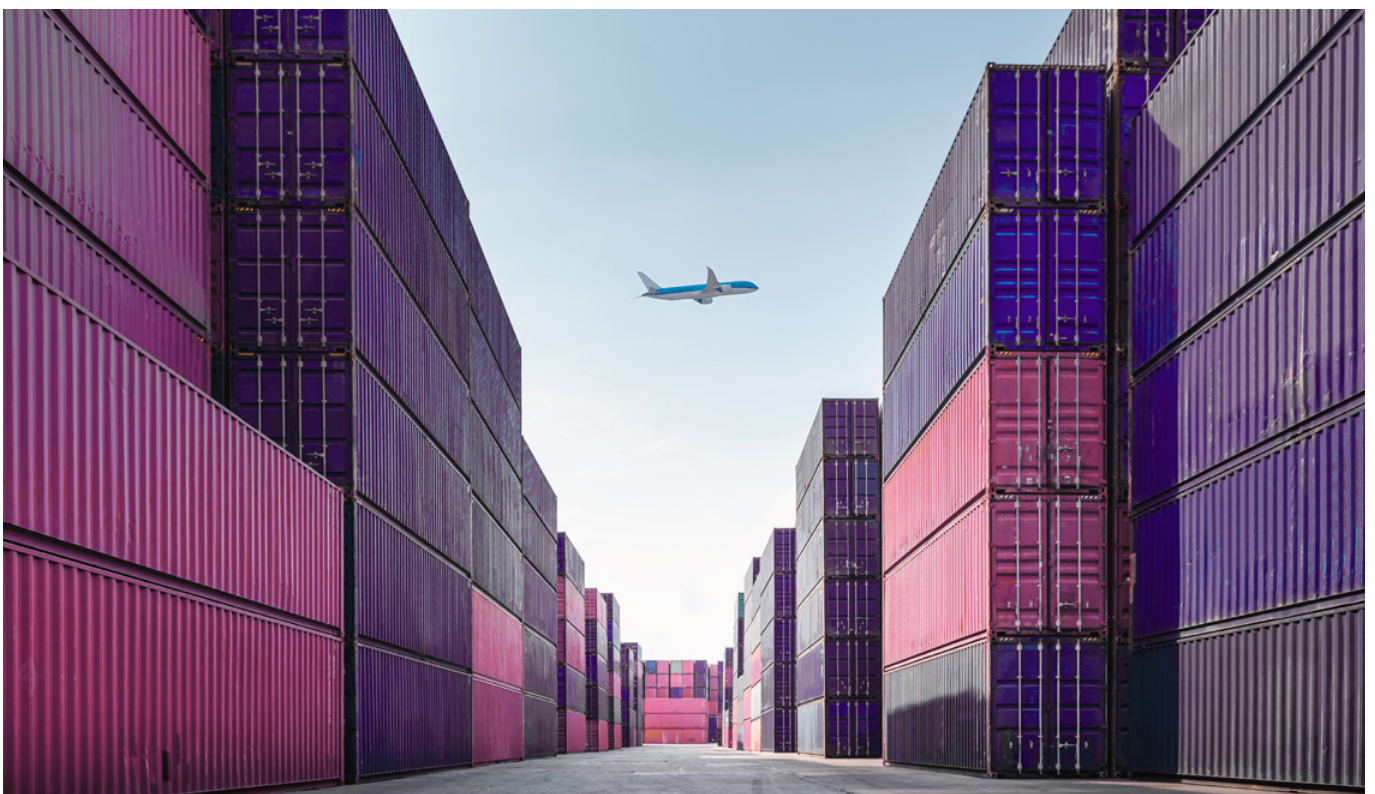
## Risk assessment

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 lower 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

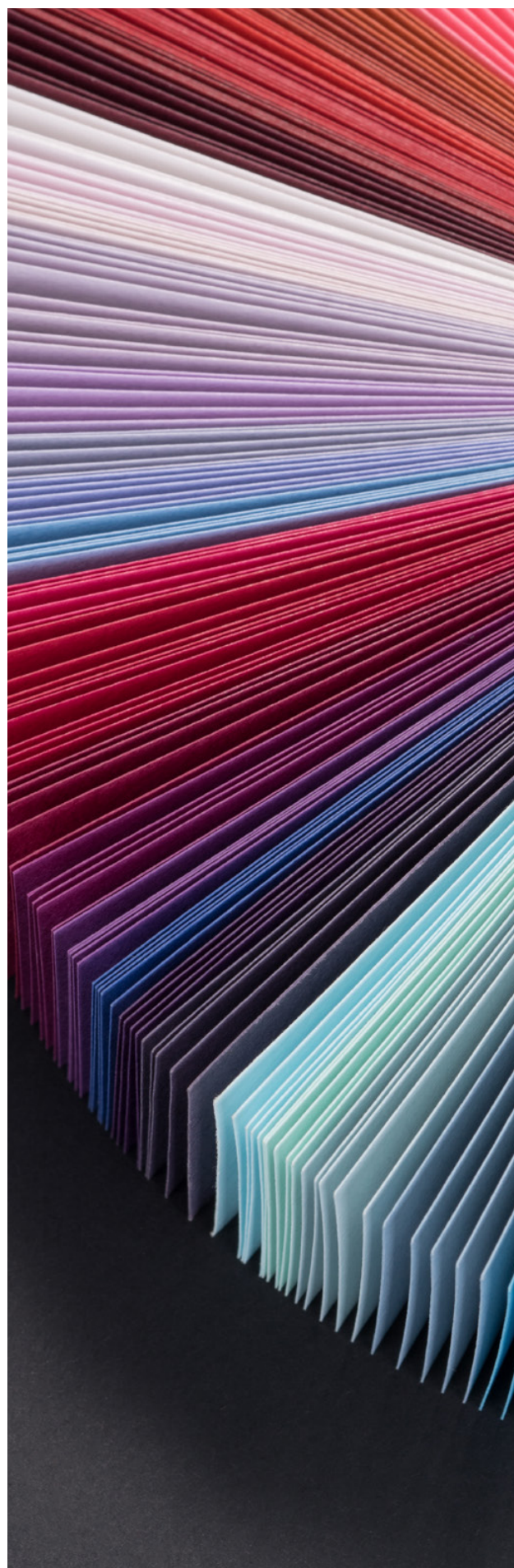
RPC considers the risk profile of all new suppliers and looks to either:

- 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.

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

- act with the highest standards of honesty, professionalism, ethics and integrity,
- demonstrate a commitment to equality of opportunity, diversity and inclusion in the way they conduct business and manage their staff,
- do not use any form of forced or involuntary labour and comply with the Act,
- implement working hours and pay staff wages which are compliant with relevant laws.

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.



## 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 and these set out our commitment to acting ethically and with integrity in our business dealings

These policies include:

- a Modern Slavery Policy
- an Anti-Bribery Policy, Gifts and Hospitality Policy
- 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 our risk and compliance team.

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## Training

All RPC staff have access to an online learning platform which provides information on modern slavery compliance on a periodic basis.

RPC raises awareness of the need for modern slavery compliance in key support teams by discussing the supplier code of conduct 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.

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## 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.

## Actions taken up to FYE April 2021



During 2021, RPC created a formal Modern Slavery Steering Group, chaired by RPC's Director of Risk and Compliance. The group is made of lawyers and business service staff from across the firm and its purpose is to raise awareness and increase the profile of modern slavery and human trafficking issues (both internally and externally) and to ensure that RPC has an ongoing plan of action.

As part of our awareness raising, RPC ran both an internal facing and external facing LinkedIn campaign to commemorate the International Day of Remembrance of the Victims of Slavery and the Transatlantic Slave Trade. This initiative identified contacts in our Asia offices with whom the Steering Group intends to work with going forward to ensure that RPC's approach to tackling modern slavery and human trafficking is truly global.

Our Asia offices have worked 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.

In the UK, RPC has also been using its Retail Group to raise awareness of issues surrounding modern slavery and human trafficking to its clients.



## Plans for the year to FYE April 2022

RPC is reviewing what more can be done to raise awareness of modern slavery, including through the use of webinars for the departments within RPC which are most at risk of being affected by these issues. It is expected that the Modern Slavery Steering Group will do online e-learning to further enhance their understanding of issues in this space and will look to increase its membership to include members of RPC's employment team so we can always be alive to the employment law aspects surrounding modern slavery and human trafficking.

We are always considering what more can be done in the context of due diligence of suppliers and looking at ways to further improve procurement processes with a view to continually assessing our suppliers. It is expected that we will undertake a mini audit of a selection of higher-risk suppliers and we will take steps to strengthen our supplier's commitments to modern slavery by reviewing our supplier code of conduct and, particularly in the context of higher risk suppliers, strengthening the terms of our compliance clauses contained within our supplier contracts.

On 18 October 2021, we plan to mark Anti-Slavery day with fund raising events for relevant charities, an information campaign in our offices and on our office intranet and a LinkedIn campaign.





# Statement

This statement has been approved by RPC's partnership executive board. This statement will be reviewed annually and made available on our website.

A handwritten signature in white ink that reads "James Miller". The signature is fluid and cursive, with a large initial "J" and a stylized "M".

**James Miller**, Managing Partner

Reviewed and revised: August 2021

Next review: October 2022

