

Slavery and Human Trafficking Statement 2024

This statement is published on behalf of Pillsbury Winthrop Shaw Pittman LLP. Pillsbury Winthrop Shaw Pittman LLP is a Limited Liability Partnership registered in England and Wales under Number OC303330 and regulated by the Solicitors Regulation Authority ("Pillsbury").

Pillsbury is committed to preventing acts of modern slavery and human trafficking from occurring within its business and so makes this statement pursuant to the Modern Slavery Act 2015 (the "Act") to set out the steps taken, as a responsible and ethical provider of professional business services, to ensure that no forms of modern slavery or human trafficking occurs anywhere within our business operations or within our supply chain.

Our Firm

Although it is a separate legal entity, Pillsbury is associated with a leading international law firm of the same name registered in Delaware USA with over 650 lawyers, supported by more than 700 staff located in 19 offices globally. Pillsbury prides itself on, and is fully committed to, providing the highest standards of legal services across a number of jurisdictions and industries, with professionalism and integrity.

For further information on Pillsbury, our business or our structure <https://www.pillsburylaw.com/en/about-us.html> please click here.

Compliance

As a professional services firm, we have stringent policies and processes already in place to ensure fair and equal employment rights and pay, working time protections and safeguards against any form of discrimination, including but not limited to harassment, which both protect our staff and set out the principles by which our staff must deal with any third parties. We consider the risk of modern slavery and human trafficking existing within our business to be extremely low.

A key part of our slavery and human trafficking strategy is to promote awareness in the form of training for those Pillsbury personnel who have responsibility in managing external suppliers (our supply chain). The training will cover the key aspects of the Act, this Statement, and the various options available to report any concerns with our Pillsbury Compliance Team as well as externally through the Modern Slavery Helpline.

Pillsbury has appointed a team to undertake a review of our recruitment, selection, hiring and promotion processes, as well as our supply chain management, at a yearly compliance meeting. The team consists of the Firm Managing Member, the Compliance Officer for Legal Practice, the Compliance Officer for Finance and Administration, London Office Managing Partner, London Professional Responsibility Committee (PRC) Partner, Money Laundering Reporting Officer (MLRO) and the London Director of Administration. Any action points will be filed on Pillsbury's Compliance Register. During 2023, the London office also established a local sub-set of this team, who have formed a London Compliance Counsel, who meet at least quarterly.

Supply chain

Pillsbury's supply chain is relatively simple with many of our key suppliers engaged in roles such as security, facilities and building management, cleaning, office supplies, recruitment, together with licenced professionals in the fields of legal advocacy, accountancy and tax.

We expect, and will require, our suppliers to

i) conduct their businesses with the same professional and ethical standards to which we adhere; and

ii) operate fair employment practices.

Pillsbury is accredited as a London Living Wage Employer and requires its suppliers to ensure that their workers are paid the living wage of the jurisdiction in which they are based (or the London living wage, if they are based in London), that working hours are not excessive, that no child labour is used and that their employment is freely chosen. For further information on the Living Wage Foundation please click here

<https://www.livingwage.org.uk/accredited-living-wage-employers>

To ensure that the above principles are adhered to Pillsbury has taken the following steps:

- We regularly engage with our suppliers to create open and respectful relationships and we review our suppliers at least once per year, usually through face-to-face meetings, to ensure that all suppliers we engage with operate in a fair and ethical manner.
- At these review meetings we expect and require our suppliers to confirm that their operations comply with the principles Pillsbury promotes.
- In the event that we become aware of a case of modern slavery occurring within our supply chain, we will work with the supplier to implement remedial action within an agreed timeline. Any continued or material breach will carry the risk of termination of their engagement.

Policies

Pillsbury has several policies that, together with our Anti-Slavery and Human Trafficking Statement, address our approach to complying with the Act and the steps necessary to prevent instances of non-compliance occurring within our business and our supply chain. These include:

- **General standards of performance and expectations of conduct:** we have strict policies, practices and highly ethical standards of behaviour which we expect all our partners, employees, contractors and consultants to follow. In addition to this, Pillsbury requires suppliers to commit to respecting and promoting international human rights and undertake that they will fulfil their obligations under the Act, or any other corresponding legislation. We also reserve the right to terminate agreements with immediate effect where the supplier commits a material breach relating to modern slavery.
- **Equality and Diversity Statement:** we place strong emphasis on respectful working relationships and in creating an environment which supports equality and diversity.
- **Whistleblowing policy:** we encourage and support all staff to report any concerns relating to the direct activity or the activity of our supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our policy is designed so that employees may easily disclose any concerns without fear of retaliation.
- **Health and Safety policy:** we are committed to providing a safe and healthy working environment for all our partners, employees, contractors and consultants.
- **Anti-Bribery policy:** our rules and principles regarding bribery and corruption apply to all our partners, employees, contractors and consultants and is strictly enforced.

Commitment to corporate social responsibility

Pillsbury is committed to contributing to deprived sections of the community in several ways including through supporting a number of non-profit and charitable organisations. Pillsbury enables this to be accomplished by encouraging those within the organisation to do pro-bono work that impacts and supports those in need. Through the Pillsbury Foundation, Pillsbury also supports programs to end hunger in local communities. From associates to senior partners, every lawyer is expected to perform a minimum of 25 hours annually in service to Pillsbury's pro-bono clients.

Our corporate social responsibility page can be <https://www.pillsburylaw.com/en/about-us.html>

Steps taken during our 2023 financial year

Our team met during the 2023 financial year.

The team has obtained and reviewed information available concerning our business and supply chains.

The team found that:

1. There have been zero incidents of modern slavery from the previous financial year. This evidences Pillsbury's commitment to ensure that no forms of modern slavery or human trafficking occurs anywhere within our business operations or within our supply chain and confirms that we have adequate safeguards in place to combat modern slavery.
2. Online training has been provided to all Partners and employees who have joined during the course of the year, to enable these members of our business to understand the requirements of the Act and to provide them with the knowledge and tools to flag potential issues. Refresher training was also provided to all Partners, employees and key London office stakeholders, during 2023.
3. The London office's Corporate Social Responsibility Committee work with several non-profit and charitable organisations to actively contribute to deprived sections of the community.
4. The London office has a formal internal office Anti-Slavery and Human Trafficking Policy, which has been communicated to all London based Partners and employees.
5. The London office developed a Supplier Modern Slavery questionnaire, which is designed for existing and any new key suppliers to provide us with pertinent information to help us determine any risks to us in entering into a business relationship with them. Key suppliers are also asked to provide information on what policies they have in place to address modern slavery risks in their business and supply chains. When responses are received, they are reviewed, and the risk assessment of the supplier will be updated accordingly. Where we identify a potential risk, it will be investigated and mitigated through activities such as enhanced due diligence.

Actions

Over the next 12 months Pillsbury aims to:

- Continue to socialise the London office Anti-Slavery and Human Trafficking policy, with online training provided to new joiners, and refresher training provided to all Partners, employees and key London office stakeholders, to raise awareness, and enable these members of our business to understand the requirements of the Act, as well as to

provide them with the knowledge and tools to flag potential issues. Such refresher training is scheduled for early January 2025.

- The London office's Corporate Social Responsibility Committee continue to explore opportunities to work with non-profit and charitable organisations to actively contribute to deprived sections of the community.
- The London office will continue to issue the London Modern Slavery questionnaire to new suppliers and monitor responses received, and update the risk assessment of the supplier accordingly. Where we identify a potential risk, it will be investigated and mitigated through activities such as enhanced due diligence.

Approval

This statement is made pursuant to section 54 of the Act with respect to the financial year ending 31 December 2023. It will be reviewed on an annual basis, and is approved by:

Michael J. Finnegan, Managing Member

On behalf of the Members of Pillsbury Winthrop Shaw Pittman LLP

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