



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern Slavery Act 2015, Section 54

Statement of Kingsley Napley LLP for the financial year ending on 31 March 2026

This statement has been prepared and is published on this website in accordance with the requirements of Section 54 of the Modern Slavery Act 2015. It summarises some of the steps which Kingsley Napley LLP has taken to prevent and detect slavery and human trafficking in its own business and in its supply chain, and its assessment of those risks.

1 Our business

Kingsley Napley LLP is a limited liability partnership incorporated in England. The firm has one office located in London and a workforce of about five hundred people. It operates in the professional services sector as an independent law firm and is authorised and regulated by the Solicitors Regulation Authority. We provide a broad range of legal services to individual, business, and government clients from the UK and abroad. Our website provides further information about the firm and its services.

2 Our approach

- 2.1 Complying with laws and regulations that govern our business and our activities is always our aim. Giving effect to the spirit behind them, especially in areas which have a focus on people, as here, is what we also try to do.
- 2.2 Operating our business in a responsible manner, for the benefit of our own people and our clients and making a positive contribution to the communities we serve and to the environment, are also important to us.
- 2.3 A Statement of Core Responsible Business Principles, which identifies some of the practical ways in which our wish to be a responsible business manifests itself in the day-to-day life of the firm, is published on this website. This statement elaborates upon paragraph 5 of that document.

3 Our initiatives

- 3.1 A Steering Group of Anti-Slavery Champions supports our anti-slavery activities by helping to raise awareness within the firm of the issues, risks, and warning signs. It comprises people of different roles and levels of seniority drawn from across the firm but particularly from those legal practice areas and business support teams for whom slavery and trafficking issues and risks are potentially most relevant.
- 3.2 Awareness raising initiatives include mandatory online training for all firm members, including for all new joiners during their induction programme. Practice areas (such as Immigration) and business services teams (such as Human Resources, Facilities, and Business Acceptance) whose roles and work have the potential to give them greater exposure to slavery and trafficking issues and risks receive additional guidance and ongoing support through their designated Anti-Slavery Champion.

- 3.3 Any member of the firm who suspects that slavery or trafficking is or might be occurring in our own business, in our supply chain, or in connection with a client matter in which we are instructed is encouraged to speak to their line manager or other appropriate person promptly. The firm's 'whistleblowing' arrangements can be used to report an issue or concern if someone is not comfortable reporting it through the usual channels
- 3.4 Risk-based reviews to help us assess and manage the risk of slavery or trafficking occurring in our own business or in our supply chain have been conducted. The outcomes of the reviews and our assessments of the risks are summarised below.

4 Our people

- 4.1 Our recruitment procedures and people management practices comply with UK immigration, employment, and health and fire safety laws. They also reflect best practice in the UK legal profession. Independently assessed 'best employer' accreditation schemes have ranked the firm highly for many years.
- 4.2 We respect our people and always try to treat them fairly. We wish them to be content in their work and to feel appropriately remunerated for their efforts. Everyone is paid above the mandatory UK national minimum wage and at or above the voluntary London Living Wage, which is higher. A wide range of benefits, including paid holiday, and life and health insurances, are available to everyone. Training opportunities to assist firm members to develop their skills and their careers are also provided. Flexible working arrangements to help them find a work-life balance that suits them are also offered.
- 4.3 We recognise that a diverse workforce provides us with access to different cultures, experiences, and views, which benefits our business, people, and clients. As a responsible business and an equal opportunities employer we work hard to cultivate an inclusive culture and a working environment where everyone can succeed based solely on merit, and which is free from discrimination, bullying, and harassment.
- 4.4 Our building and working practices comply with health and fire safety laws and provide our people with a safe and comfortable working environment. Our health and safety activities are complemented by a comprehensive wellness programme which offers a broad range of health-related benefits and initiatives to all firm members.

5 Our suppliers

- 5.1 We recognise that certain areas of our supply chain are potentially more exposed to slavery or trafficking issues and risks than is our own business. Because of that, we have created an online resource to help us map out, gain visibility on, and manage, our supply chain. We use it to identify and assess: who our suppliers are; what sectors they operate in; what products or services they supply to us; where they are located geographically; and, if possible, from where they might source commodities or their own suppliers. The Chief Legal Officer oversees and manages a risk-based Supplier Management Programme which includes inception processes for, and

ongoing monitoring of, our key suppliers, and suppliers we consider to be higher risk.

- 5.2 The nature and composition of our supply chain reflect our activities as a provider of legally focused professional services. Some are small, owner-managed businesses operating locally or nationally (such as catering providers and courier companies). Others are large companies, many of them household names, which operate globally (such as banks, insurers, and technology companies). As with all law firms, our largest areas of expenditure do not involve the sourcing of commodities or products and instead relate to premises, technology, marketing, and the procurement of other professional services (such as banking, insurance, audit, and tax services).
- 5.3 We only wish to retain, and work with, suppliers who share our own values. We expect our suppliers to operate their own businesses and their own supply chains responsibly, in accordance with applicable laws and regulations, and to high ethical standards. The above-mentioned Statement of Core Responsible Business Principles, and a Supplier Code of Conduct which we have also prepared, tell our suppliers what our values are and what we expect of them. They are supported by an internal Procurement Protocol which provides business services team members with guidance on selecting and managing suppliers. The protocol contains a checklist of compliance issues and risk considerations to have regard to when selecting or managing suppliers and includes reminders about forced labour and human trafficking risks.
- 5.4 The firm is a signatory to the Charter of the London Living Wage Foundation whose requirement that everyone working in London should be paid not just the national minimum wage but a living wage for London extends not only to our own people but also to certain of our key suppliers. We have engaged with those of our key suppliers who operate in low paying sectors of the economy (such as cleaning, catering, and security) to ensure, and we have received written commitments from each of them confirming, that those of their people who they deploy to work for us are also paid at least the London Living Wage, as are our own people.

6 Our risks

- 6.1 We are based in the United Kingdom, which respects the rule of law and human rights and has strong protections for workers, including comprehensive labour rights. We do not have an office, or employ people, abroad. We operate in the professional services sector as a regulated law firm, and not in a sector or industry which sources commodities from overseas or is higher risk for slavery or trafficking purposes. Our labour needs are not manual or seasonal, and our workforce is directly engaged, highly educated, and in many cases, professionally qualified. Our wish to operate our business compliantly and responsibly is underpinned by a comprehensive set of arrangements which we have put in place to manage all aspects of business conduct, professional ethics, and people management. We consider that there is a low risk of slavery or human trafficking occurring within our own business for those reasons.
- 6.2 For those same reasons we believe that our supply chain is also low risk, but we also recognise that there is potentially a greater risk of slavery or human trafficking occurring in certain areas of our supply chain than there is in our own business. It

is towards our supply chain therefore that most of our anti-slavery and anti-trafficking activities and monitoring is directed. Suppliers, products, and services which we consider have the potential to be higher risk receive the most scrutiny and attention through the above-mentioned Supplier Management Programme.

This statement was prepared by the firm's General Counsel in conjunction with the Senior Leadership Team, Compliance Committee and Anti-Slavery Champions, whose members have approved it. The Senior Partner, Managing Partner and General Counsel have put their names to the statement below as evidence of such approval and of the firm's continuing commitment to prevent and detect slavery and human trafficking.

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Kingsley Napley LLP is a limited liability partnership incorporated in England and Wales under number OC343278 and is authorised and regulated by the Solicitors Regulation Authority under number 500046. The address of our registered office is shown above. A list of the names of its members is available for inspection at the registered office and on its website www.kingsleynapley.co.uk.