

## Bates Wells

### MODERN SLAVERY POLICY

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Modern slavery is a crime and a violation of fundamental human rights that affects people almost everywhere, including the UK. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero tolerance approach to slavery and human trafficking and expect the same high standards from those we work with.

We consider our firm to be relatively low risk in relation to modern slavery, given the sector in which we operate. It is not mandatory for Bates Wells to have this Policy as our turnover does not meet the required threshold in excess of £36m, but we have chosen to do so since high ethical standards and integrity are fundamental to our core values.

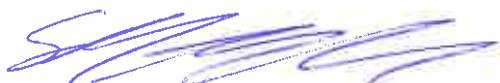
Bates Wells will:

1. Check that all personnel working at the firm are entitled to work in the UK by reviewing original passports, visa, taxation and other relevant documentation.
2. Ensure that all personnel working at the firm are paid fairly and receive at least the London Living Wage, and are free to leave their employment.
3. Provide this Policy to all our employees and post it on our website.
4. As a professional services firm our supply chain is limited to general business suppliers and expert witnesses and Counsel who support us in the services we provide to clients. We will pay close attention to our supply chain and look to ensure that our suppliers share our values by:
  - 4.1 Encouraging all new suppliers to check their supply chains to ensure the potential for slavery and human trafficking is significantly reduced.
  - 4.2 Ensuring suppliers and subcontractors pay fair wages and provide working conditions that are acceptable, and ensuring that employees are free to leave their employment.
5. Encourage the reporting of concerns and safeguard individuals in accordance with our [Whistleblowing Policy](#).

Our Management Board and management representatives take responsibility for implementing this policy and its objectives and will provide the necessary resources to ensure its practices are effective in ensuring that modern day slavery is not taking place within our supply chain.

This statement is approved by our COO who will review and update it annually.

Signature:



Sally Procopis, COO

Bates Wells & Braithwaite London LLP

Date: 16 November 2018