

# Slavery and Human Trafficking Statement 2021

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# Slavery and Human Trafficking Statement 2021

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This Statement outlines the steps we have taken in the last twelve months to combat the risk of modern slavery and human trafficking taking place in either our business or our supply chains, and our focus areas for the year ahead.

This is our sixth statement published in accordance with Section 54 of the Modern Slavery Act 2015 and applies to DWF Group plc, DWF Law LLP and DWF LLP covering the financial year ended 30 April 2021.

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## Background

Modern slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, forced and compulsory labour, child labour and human trafficking.

In line with our purpose and guided by our values, our approach is to understand how and where modern slavery occurs and to continuously review and improve the policies and processes we have in place to prevent it. This expectation is set out in our global Code of Conduct and reinforced in our Supplier Code of Conduct. The global Code of Conduct encourages colleagues to report, through our Speak Up policy and on line platform, any actions that are unsafe, unethical, unlawful, or not in line with DWF Group policies.

In practice, we are:

- Continuing to raise and maintain employee awareness of the risks of modern slavery and human trafficking
- Reviewing and strengthening our supply chain risk assessment processes
- Collaborating across sectors to gain insight.

## Governance

DWF supports the principles of Human Rights set out in the Universal Declaration of Human Rights, the International Labour Organisation (ILO) core labour standards and is a signatory of the United Nations Global Compact.

We make a public commitment to responsible business covering human rights, employment standards, environment and anti-corruption. We report annually on progress against these principles through a publicly available "Communication on Progress" report. Principle one is "the protection of internationally proclaimed human rights" and principle four is "the elimination of all forms of forced and compulsory labour."

Since our last statement, the Board have approved a new ESG (Environmental, Social, Governance) Strategy to scale our collective impact and ambition globally. A Group Head of ESG, has been appointed and an ESG Leadership Group established, to oversee and monitor the implementation of the Strategy.

The ESG Leadership Group is drawn from across the business and includes our Group Chief Operating Officer and representatives from Company Secretariat, Client Development, Facilities, Property & Procurement, Finance, Risk and HR.

The ESG Leadership Group identifies and reports quarterly to the Executive Board and at least twice a year to the Board, on ESG related risks and opportunities, and actions needed to improve ESG in line with the ESG Strategy and evolving internal and external stakeholder expectations.

As a business providing legal and other professional services, we consider the risk of modern slavery happening within our business to be low.

## Business, Organisational Structure & Supply Chains

DWF is a leading global provider of integrated legal and business services.

Our offices and associations are located in the UK, Australia, USA, Canada, Europe, the Middle East and Asia. We employ approximately 4000 people and deliver integrated legal and business services on a global scale through our three offerings; Legal Advisory, Mindcrest and Connected Services, across our eight key sectors:

- Consumer
- Energy and Natural Resources
- Financial Services
- Insurance
- Government and Public Sector
- Real Estate
- Technology, Media and Communications
- Transport

DWF is a collective trading name for DWF Group plc and all of its subsidiaries and subsidiary undertakings (as defined in the UK's Companies Act 2006) including DWF Law LLP, DWF LLP and all incorporated associations without legal personality.

We have more than 2,000 direct suppliers in our supply chain providing recruitment, goods and services to support the operational requirements of a global business. Over the last 12 months our largest categories of spend have been in premises, recruitment & IT. Other supplier categories include office supplies, cleaning, professional services and business travel.

## Policies

Our global Code of Conduct and Values & Behaviours in Action Guide set out clear expectations, reinforced through the following policies available to all employees internally.

These policies visibly reflect our commitment to responsible business policies and practices that are fair, transparent and inclusive:

- Human rights
- Anti-Slavery
- Sustainability
- Anti-Bribery & Corruption
- Speak Up
- Diversity & inclusion
- Dignity at work
- Ethical Sourcing

Our employment policies and pre-employment screening processes make sure that all our employees have the appropriate rights to work and are employed in accordance with local employment legislation. We believe it is important that all employees are appropriately rewarded for the work they do and in the UK, we are accredited as a Living Wage Employer.

We are committed to maintaining an open culture with the highest standards of honesty and accountability, a culture where colleagues can report any legitimate concerns in confidence. Where the requirements of our Speak Up policy have been met, DWF undertakes to protect employees from any victimisation, harassment or bullying which may result from disclosure.



## Managing our Supply Chain

Expectations of suppliers are grouped into six key areas:

- Human Rights
- Health & Safety
- Responsible Supply Chain Management
- Inclusion & Diversity
- Business Integrity
- Environmental Management

To help make more informed purchasing decisions, sustainability risk criteria, including human rights and employment practices are fully integrated into the sourcing process. We have introduced a supply chain assurance governance framework aligned to supplier category - which includes a specific modern slavery risk assessment.

All DWF suppliers are expected to implement a zero tolerance approach to slavery, forced labour and human trafficking and comply with all local and national laws and regulations.

Our process includes details of every Request for Proposal (RFP) participant's compliance assessed through a suite of due diligence checks, which includes a statement of compliance with our Supplier Code of Conduct and a mandatory Ethical Sourcing Questionnaire response. The questionnaire assists with identifying potential areas of risk within the supply chain, and aligns to our Ethical Sourcing Policy, draws from the International Labour Organisation and the Ethical Trading Initiative Base Code, and consolidates input from other stakeholders.

If a supplier provides a non-compliant answer to our questionnaire, such as the occurrence of an employment tribunal in the last three years, or non-compliance with Modern Slavery legislation, we will act upon it, and - when it is considered appropriate - work collaboratively with our suppliers/contractors to develop corrective action plans in order to remedy shortcomings and raise standards over time. In the event that a supplier/contractor is unwilling or unable to address any identified actual or potential issues, or an issue is identified as critical in nature, then DWF reserve the right to take rapid and emphatic steps that could include termination of any and all agreements in existence.

The majority of our direct suppliers represent a low risk of modern slavery suppliers but existing suppliers are required to sign a statement of compliance, undertaking that they have reviewed their business operations and their supply chains for evidence of any instances of slavery, forced labour or human trafficking. If suppliers

are not willing to improve their performance, despite our efforts to engage and support, we may withdraw from contracts or switch to other suppliers.

## Training & Awareness

We have continued to enhance our awareness to improve understanding of modern slavery so all our employees can support in the fight against it. Our training covers:

- The different types of criminal offences under the Modern Slavery Act
- The practical checks to be made when recruiting new employees
- How to identify victims of slavery
- The due diligence that needs to take place when working with clients and suppliers

All new joiners are made aware of our Modern Slavery Statement and on line Training via our Induction & Onboarding Portal.

## Stakeholder engagement

We continue to collaborate with our peers, supply chain, clients and external organisations to improve our approach to understanding the potential risk of modern slavery in our own supply chains and across the industry.

DWF recognises the importance of our stakeholder engagement and we are proud to be a signatory to the United Nations Global Compact and Women's Empowerment Principles.

## Global Code of Conduct

In November 2020, we launched our global Code of Conduct, Ethics Statement and Speak Up Policy & Helpline.

The Code reinforces our zero tolerance approach to:

- Unsafe, illegal or unethical working practices
- Discrimination, bullying and harassment
- Bribery and corruption
- Retaliation against anyone who speaks up and does the right thing

Our Code states that any individual involved in the procurement of goods and services must also demonstrate an awareness and understanding of DWF's Modern Slavery statement, Anti-Slavery Policy and have received training and guidance to assess the human rights and labour performance of suppliers.

## Speak Up policy and helpline

We are committed to maintaining an open culture with the highest standards of honesty and accountability, a culture where colleagues can report any legitimate concerns in confidence.

Our Speak Up policy outlines the process to raise a concern about wrongdoing, safe in the knowledge that it is investigated promptly and effectively. An independent supplier, Convercent, manages our online and phone-based system, enabling colleagues to raise a concern about a genuine suspicion of malpractice or wrongdoing within the DWF Group.

## Measuring Effectiveness

We have reviewed and will continue to review and report on the following indicators to assess the effectiveness of our actions:

Zero incidences of Modern Slavery in our operations - In the last 12 months, we had no reported incidents of slavery or trafficking in our operations.

- Zero incidences of Modern Slavery in our supply chain – In the last 12 months, we had no reported incidents of slavery or trafficking in our supply chain.
- Numbers of colleagues trained in relation to modern slavery and trafficking - 743 employees completed Modern Slavery Training in the last financial year.
- Incidents of Modern Slavery reported through our Speak Up line – In the last 12 months, there have been no incidents of modern slavery reported through our Speak Up line
- Zero incidences of Modern Slavery in our operations - In the last 12 months, we had no reported incidents of slavery or trafficking in our operations.

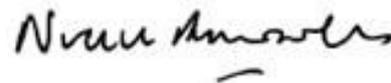
## Looking ahead to our 2022 Modern Slavery

Statement we will seek to:

- Continue to regularly review and improve our supplier risk assessment processes
- Continue to engage with stakeholders to promote human rights and the prevention of modern slavery
- Further enhance ESG client due diligence and escalation process
- Continue to educate and promote a speak up culture within our business, encouraging all of our employees or those working on our behalf to raise any concerns.

Ultimately, there is no place for modern slavery in our business or our supply chain and we will continue to evolve the way we identify and mitigate modern slavery and human trafficking risks.

The Directors of DWF Group plc approved this statement on 1 December 2021. The Designated Members of DWF Law LLP and DWF LLP approved this statement on 1 December 2021.

A handwritten signature in black ink, which appears to read "Nigel Knowles".

### Sir Nigel Knowles

**Group CEO and director of DWF Group plc and designated member of DWF Law LLP and DWF LLP**

1 December 2021



## DWF is a leading global provider of integrated legal and business services.

Our Integrated Legal Management approach delivers greater efficiency, price certainty and transparency for our clients. All of this, without compromising on quality or service. We deliver integrated legal and business services on a global scale through our three offerings; Legal Advisory, Mindcrest and Connected Services, across our eight key sectors. We seamlessly combine any number of our services to deliver bespoke solutions for our diverse clients.

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