



Slavery and Human Trafficking Statement 2020



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Slavery and Human Trafficking Statement 2020



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 fifth statement published in accordance with Section 54 of the Modern Slavery Act 2015 and applies to the DWF Group.

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.

Our personal responsibility is to not engage with any business knowingly involved in any aspect of modern slavery. 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.

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. In practice, this means:

- Raising 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 and share knowledge and adopt best practice.

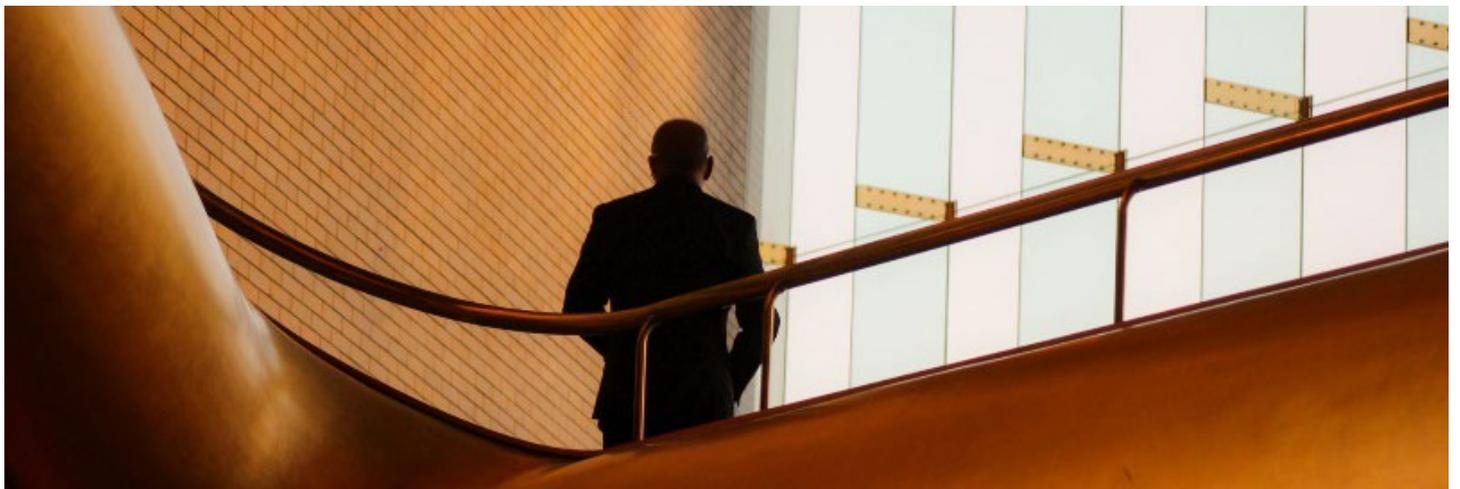
Governance

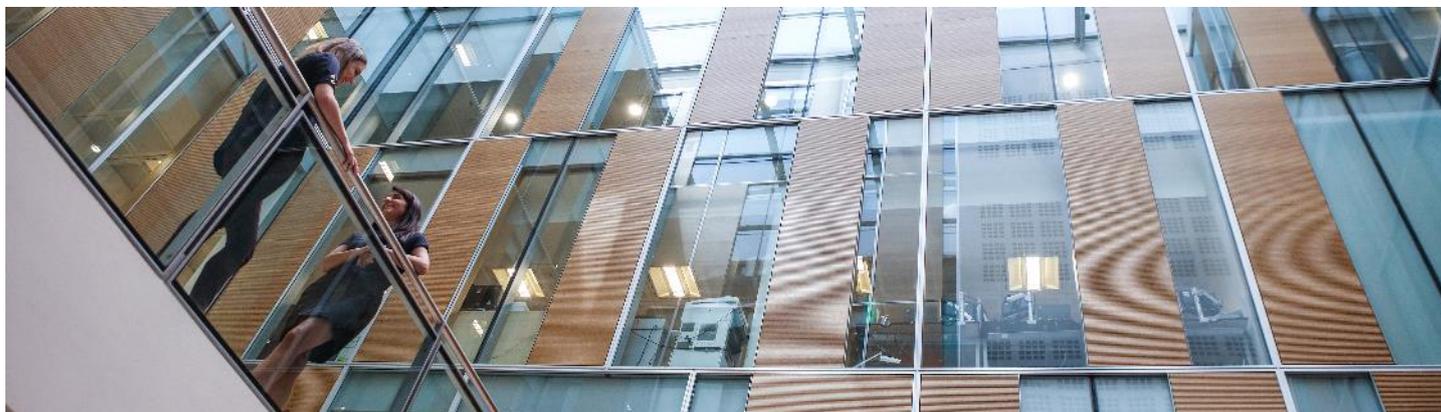
DWF supports the principles of Human Rights set out in the Universal Declaration of Human Rights, the International Labour Organisation (ILO) core labour standards and is a signatory of the United Nations Global Compact.

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."

Our CSR Leadership Group supports the Board in overseeing our responsible business agenda. We also continue to be an active member of Business in the Community (BITC), the largest business-led membership organisation in the UK dedicated to responsible business and use their Responsible Business Tracker to measure and evaluate our performance.

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 and supply chains

We provide solutions for clients across a range of complex, managed and connected legal services, which are at the heart of our integrated offering adding value for clients. We have offices in 31 locations across four continents, with more than 4,200 people. We also work in association with six other legal businesses around the world, in the USA, Argentina, Panama, Colombia, Turkey and South Africa. Our key industry sectors continue to be Insurance, Financial Services and Real Estate, with deep expertise extending across five other sectors:

- Energy & Industrials
- Retail, Food & Hospitality
- Public Sector
- Technology
- Transport

DWF is the collective trading name for our global legal practice and multi-disciplinary commercial business comprising DWF Group plc and its group entities, including DWF LLP, DWF Law LLP, its and their subsidiaries and subsidiary undertakings, any of its and their holding companies and parent undertakings, and any subsidiary or subsidiary undertaking of such holding companies and parent undertakings (in each case as defined by sections 1159 and/or 1162 of the Companies Act 2006, as applicable).

The way we do business is based on our values and reflects the inclusive behaviours that we want to be known for. We run our business with integrity and act responsibly to make DWF a great place to work and do business. This includes the manner in which we source goods and services from our suppliers.

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, catering, professional services and business travel.

Policies

Our Values, Code of Conduct and Behaviours Framework guides our actions and behaviours with clear expectations set out in policies which are available to all employees internally.

We have a number of policies and procedures in place that reflect the way we do business and set out expectations to all our employees. These policies visibly reflect our commitment to responsible business policies and practices that are fair, transparent and inclusive. These include:

- Human rights
- Anti-Slavery
- CSR/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.

In the last 12 months we had no reported incidents of slavery or trafficking in our operations.

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 developed a risk based approach to supplier categorisation of goods and services and introduced a modern slavery supplier risk assessment and expanded due diligence for critical suppliers.

All DWF suppliers will be 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 which 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.

In the last 12 months we had no reported incidents of slavery or trafficking from our suppliers.



Training and 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 that should 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 & On-boarding Portal.

2,255 employees completed Modern Slavery Training in the last financial year.

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. We are also a participating member of the Greater Manchester Modern Slavery Business Network, a cross sector group collaborating to share good practice, experiences and challenges in addressing modern slavery.

On 6th March 2020, we brought members of the network together at our Manchester office to share our experience of addressing the risk of modern slavery in the supply chain of a legal business, to hear from DWF suppliers on their approach and to enlighten network members about supporting young victims of human trafficking.



Global Code of Conduct

In November 2020, we will launch 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

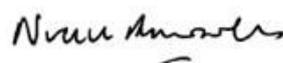
We are committed to maintaining an open culture with the highest standards of honesty and accountability, a culture where colleagues can report any legitimate concerns in confidence.

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

Current and future plans

- 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
- 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.



Sir Nigel Knowles

Group CEO



Beyond borders, sectors and expectations

DWF is a global legal business, connecting expert services with innovative thinkers across diverse sectors. Like us, our clients recognise that the world is changing fast and the old rules no longer apply.

That's why we're always finding agile ways to tackle new challenges together. But we don't simply claim to be different. We prove it through every detail of our work, across every level. We go beyond conventions and expectations.

Join us on the journey.