

Slavery and Human Trafficking Statement 2021

This statement is published on behalf of DLA Piper International LLP and DLA Piper UK LLP pursuant to Section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 30 April 2021. References to “DLA Piper,” “we,” “us,” “our” or the “firm” are to these named entities.

Introduction

DLA Piper is committed to the highest standards of professionalism, ethical behaviour and integrity in everything we do and to contributing to the wellbeing of communities around the world, and has a zero tolerance approach to all human rights abuses. In this we are committed to opposing modern slavery in all its forms, and we do not tolerate it either within our business or within our supply chain.

As a firm, we are committed to adhering to the following core values in all our dealings with our clients, our people and our communities:



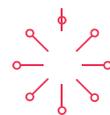
Be Supportive



Be Collaborative



Be Bold



Be Exceptional

Our organisation structure and supply chain

DLA Piper International LLP and DLA Piper UK LLP are part of DLA Piper, a global law firm operating through a number of separately constituted and regulated legal entities which provide legal and other client services in accordance with the relevant laws of the jurisdictions in which they respectively operate. DLA Piper is a professional services business which predominantly employs professionally qualified and highly skilled people. Further information about the DLA Piper global law firm, including information on the countries in which we operate, can be found on our website by [clicking here](#).

Our supply chain consists of goods and services procured to enable our people to deliver these services. Our relationships with sub-contractors, suppliers and their employees, business partners, agents and others working on their behalf (collectively "Third Parties") principally include professional services and consultancy, property, facilities management, human resources, information technology and marketing.

Our anti-modern slavery strategy and diligence processes are developed and reviewed by a cross-functional Sustainable Procurement Working Group, including representatives from our Procurement, Property and Workplace, Responsible Business, and Office of the General Counsel teams. In the last 12 months we have continued to roll out our updated Sustainable Procurement Policy and the new Supplier Code of Conduct, and plan actions arising from the supply chain environmental, social and governance ("ESG") risk assessment completed in summer 2020. The Working Group is sponsored by our Chief Operating Officer and is accountable to the firm's Executive and Board.

There have been no material changes to our organisational structure or our supply chain during this reporting period.

Our policies in relation to slavery and human trafficking

Our policy framework includes a range of People and Procurement policies that outline our commitment to preventing modern slavery and human trafficking risks in our business and supply chain. Relevant policies include:

- **Human Rights & Modern Slavery Policy:** makes explicit our commitment to the United Nations Guiding Principles on Business and Human Rights, endorsed by the International Bar Association. This Policy confirms our commitment to respect and support international human rights, and in particular to the International Bill of Rights and the International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work.
- **International Inclusion Guidelines:** Encourages all our people to value diversity, actively promote inclusion, respect each person's individuality, and to ensure that no partner, employee, agency worker,

contractor or self-employed consultant, receives less favourable treatment on the basis of colour, race, nationality, ethnic or national origins, sexuality or gender, disability, age or religion or belief. Our International Inclusion Guidelines are further supported by relevant country-level policies.

- **Ethics Policy:** embodies the key ethical obligations of the firm and our people. It is pervasive in everything we do and in all our dealings, whether directly related to the provision of legal services or otherwise.
- **Whistleblowing Policy:** offers individuals a confidential mechanism for disclosing suspicions or knowledge of possible impropriety to protect the firm, its brand, people and clients by delivering an early warning when something goes wrong. This includes matters pertaining to our supply chain, which includes modern slavery.
- **Incident Reporting Policy:** offers individuals a mechanism for reporting breaches of firm policies and procedures, and errors, acts or omissions which result in breach of the legal or regulatory obligations of individuals or the firm. All our people have a personal obligation to report such incidents promptly and honestly when identified.
- **Anti-bribery and Corruption Policy:** sets out the firm's rules and what is expected of all our people. We expect the same standard of conduct from the firm's contractors and third-party service providers in all dealings on our behalf. This policy and the supporting procedure is currently being reviewed and updated, and will be relaunched in 2022.
- **Anti-facilitation of tax evasion policy:** sets out the firm's commitment that it will not engage in tax evasion or the facilitation of tax evasion, and articulates the role and responsibility all our people have in preventing tax evasion and its facilitation. Where appropriate, suppliers are required to adopt the same standard of conduct when acting on the firm's behalf.
- **Sustainable Procurement Policy:** outlines the firm's approach to integrating the management of environmental, social and economic issues into our procurement management systems. The policy aligns with the Universal Declaration of Human Rights; UN Global Compact Ten Principles; UN Guiding Principles on Business and Human Rights and the Fundamental Conventions of the ILO. This policy has been updated to align more closely with ISO 20400 sustainable procurement standards and is published on our external website, [click here](#).
- **Supplier Code of Conduct:** Sets out our expectations of third parties providing goods and services to DLA Piper in relation to human rights, labour conditions, health and safety, environment, ethical business practice, inclusive procurement, and other critical business conduct topics. It is aligned with the Universal Declaration of Human Rights; UN Global Compact Ten Principles; UN Guiding Principles on Business and Human Rights and the Fundamental Conventions of the ILO. This policy is published on our external website, [Click here](#).

All of these policies have been made available to all of our people on our Intranet pages.

We comply with all applicable employment law relating to employee terms and conditions, including pay, and have been accredited as a UK Living Wage Employer by the Living Wage Foundation.

The firm is committed to addressing the health and wellbeing of our people, and has implemented a programme under Executive sponsorship, led by the Health and Wellbeing Steering Committee, and supported by a network of Mental Health Wellbeing Champions. The programme has been stepped up in response to the COVID-19 crisis. A major initiative was the international launch across all of our countries of our MyCare Employee Assistance Programme and online app. We also launched our online coronavirus hub, with guidance on coping with the demands of remote working, maintaining healthy working practices, staying positive and connected, and avoiding burnout, and rolled out our SPEAK Ambassador programme, a network of colleagues who have been specially trained in how to have conversations about mental health.

Other initiatives included a refreshed flexible working policy, a resilience programme to help our people navigate the stresses and anxieties of lockdown, and additional support such as home workstation assessments by ergonomic specialists. This support was offered to all our people.

Over the course of 2020 we ran a programme of wellbeing surveys to gain insights into how our people were coping during this challenging period, the output from which informed the development of the health and wellbeing resources offered.

Strategy and supply chain due diligence

DLA Piper expects our suppliers to adopt the same high standards that we adhere to and have fair employment practices. These standards are reflected in the policies we share with our suppliers and ask them to commit to as part of a tender process. They include our Human Rights and Modern Slavery Policy and Sustainable Procurement Policy and specifically deal with modern slavery by including, amongst other things, that our suppliers ensure that employment is freely chosen, child labour shall not be used, living wages are paid and working hours are not excessive, among other things.

In the last 12 months we have:

- implemented a new Supplier Code of Conduct ("**CoC**") which is now incorporated into new contracts;

- launched the development of a new supplier segmentation and relationship management framework (Total SRM), which will integrate supply chain operational and ESG risks in one integrated system. The framework will allow us to prioritise suppliers based on risks, including ESG risks, more efficiently;
- procured and began onboarding a new ESG data management platform which will allow us to better manage data and review progress towards our sustainability goals in our supply chain, including those related to modern slavery;
- increased the capacity of our procurement team, including for managing human rights risks in our supply chain:
- ran a significant Request for Proposal process for our Corporate Power Purchase Agreement, which included human rights and modern slavery risk screening of potential suppliers. This involved reviewing whether potential suppliers have labour and human rights policies and risk management procedures in place as well as publicly available information or potential red flags in relation to social responsibility and performance. Integral to the selection process was confidence in the vendor's approach to supply chain management;
- planned further actions for the next 12 months based on the results of our completed supply chain ESG risk assessment; and
- undertaken a review of and updated the firm's whistleblowing policy, procedure, and processes. This included the procurement of a third party supplier to support the receipt of reports and disclosures from internal and external stakeholders either by telephone or in writing. Whistleblowers using this service can choose to remain anonymous. This service will be live from December 2021.

The objective is to equip the firm to mitigate potential risks throughout the supplier engagement lifecycle from on-boarding through to performance improvement. We continue to gain further visibility across our supply chain, regularly review our data sets and risk register and ensure the continuous improvement of our approach to supply chain and modern slavery risk management.

The Sustainable Procurement Working Group's workplan for 2021/2022 will concentrate on further embedding modern slavery and human rights risk management into all procurement processes across the firm. Alongside the actions mentioned elsewhere, this will include an ongoing review of contract terms, RFP processes and purchase order terms, and the deployment of the new Supplier Segmentation/Supplier Relationship Management framework to further develop the firm's approach to risk assessment, supplier diligence and monitoring.

Risk assessment and management

Our primary method of assessing and addressing the risk of modern slavery across our reporting entities is through a supply chain ESG risk assessment. The assessment is risk based and targeted to identify “higher risk” suppliers. We also assess and manage the risk of modern slavery pre-contract with each supplier, and on an ongoing basis during contract management and review:

- Pre-contract: our standard Request for Proposals template completed by suppliers includes specific questions designed to identify modern slavery risk, and establish what measures potential mitigation suppliers have in place. This information and the output of our other due diligence is used to decide what mitigating measures are required.
- Contract management and review: Our standard contract terms contain a clause by which we ask suppliers to commit to respecting and supporting international human rights and undertake that they will comply with their obligations under the Modern Slavery Act or any other similar legislation as well as any of our policies that are shared with them. We also reserve the right to terminate agreements with immediate effect when the supplier commits a material breach.

In some of our contracts where the risk of modern slavery is heightened, we include requirements for our suppliers to have in place:

- a policy commitment prohibiting the use of modern slavery that is approved at board or senior-management level and which sets out its expectations on personnel and suppliers/subcontractors;
- risk screening and diligence procedures to identify and monitor the risk of modern slavery;
- corrective action plans to investigate, respond to and mitigate any identified risk of modern slavery;
- training on modern slavery risk identification and management; and
- a reporting and/or whistleblowing mechanism for personnel and third parties to report any actual or suspected risk of modern slavery.

Where relevant, we also require that some suppliers pass these commitments down to their own suppliers and subcontractors.

In relation to supplier engagement, the frequency of meetings is dictated by a number of factors, including consideration of the risks posed by involvement in modern slavery. Our contracts contain a contractual right to audit our suppliers. We also receive independent feedback on our performance from certain key clients who audit their relationship with us as their suppliers.

Through ongoing supplier management routines, supplier engagement, and at break points such as contract renewal, the effectiveness of the steps taken to mitigate risk are re-assessed, and changed or enhanced where necessary.

There have been no material changes to our principal third-party suppliers, who continue to be businesses which supply services related to the running of our premises (such as cleaners, caterers and security), and supply of the stationery and consumables needed to deliver our legal services to clients.

Similarly, those areas of our business and supply chain that carry a potential risk of modern slavery remain predominantly those which involve suppliers providing goods and services outside the UK, specifically Africa, the Middle East, and South East Asia.

We recognise that COVID-19 has and will continue to impact the risk of modern slavery across a range of sectors. The closure of offices during lockdown had a significant impact on many of our suppliers’ businesses, particularly those who provide services such as office catering, cleaning and security. We worked closely with each of our suppliers to understand their needs and plan how best to support them during this time. This included furloughing staff, as well as maintaining some key services (such as building maintenance) to ensure offices were ready to reopen as lockdown restrictions were lifted. We have undertaken and will continue to update such assessments and steps as necessary to address this and other emerging risks.

Monitoring and performance indicators

Our cross-functional Sustainable Procurement Working Group holds quarterly meetings to measure the effectiveness of our strategy and continuously review our priorities and performance. The following Key Performance Indicators are used to monitor the effectiveness of our risk management processes:

- the percentage of higher risk suppliers that have signed up to the Sustainable Procurement Policy and the Supplier Code of Conduct;
- the percentage of higher risk suppliers with contracts that include relevant clauses on environmental, labour, and human rights requirements;
- the percentage of key suppliers who have sustainability objectives in place; and
- the percentage of our people with procurement responsibilities across all locations who have received training on the Modern Slavery Act/sustainable procurement.

These are annual targets reviewed at the end of each reporting period. Our target for all four key performance indicators is 100%.

Reporting concerns

Our values promote an open and collaborative culture in which people can speak up safely and in confidence. The firm encourages its people to report concerns to managers, supervisors, and to human resources, alongside which it has two more formal reporting mechanisms in place:

- Incident reporting: to report errors or omissions which result in failures to comply with the firm's policies and procedures, or which could result in a breach of legal or regulatory obligations; and
- Whistleblowing: a confidential mechanism for individuals to disclose suspicions of impropriety or wrongdoing (updated from December 2021).

Disclosures related to modern slavery can be made via any of the above mechanisms in confidence.

Training

All members of the Procurement team and others involved in procurement activities are required to undertake mandatory training on modern slavery and human trafficking. The training incorporates references to the Sustainable Procurement Policy, Supplier Code of Conduct and other enhancements to the firm's approach. In 2020/21, 80% of these individuals have completed the training.

The topic of sustainable procurement has already been integrated into the firm's new starter induction presentation. During the next year, we are planning to develop and roll out mandatory modern slavery training to all of our people, regardless of their role in the firm.

Responsible Business

At DLA Piper, we believe great businesses can make a better world. That's why, every day, we help our clients to succeed, and be responsible, sustainable businesses. Our view is that, together, we can make business better.

We have a responsible ethos and care about our people, our communities and the environment, and uphold high governance and ethical standards. As a firm, we actively engage with our people, our clients and our communities to understand evolving expectations, and ensure we meet and exceed those expectations.

Our Responsible Business strategy encompasses our approach to our people, our communities and partners, and the environment. The Responsible Business team also ensures the firm has a joined-up approach to Sustainability and ESG work with our clients, supporting our service areas and lawyers with clarity on social and environmental risks and opportunities.

DLA Piper has been a signatory to the UN Global Compact (UNGC) 10 Principles since 2013. We have aligned our strategies and operations with the universal principles on human rights, labour, anti-corruption and the environment. We publish an annual Communication on Progress, as part of our Sustainability Report, to reaffirm our commitment to these principles and demonstrate our progress in working to achieve them. Since the Sustainable Development Goals (SDGs) were agreed in 2015, we also embraced them as a guiding framework for achieving positive impact. Our latest Sustainability Report is published on our website, [click here](#).

Over the coming year we plan to refresh our understanding of which SDGs are most material to our firm. We will also put in place systems to measure our progress towards contributing to the achievement of specific targets.

Board approval

The DLA Piper Board approved this statement on behalf of the members on 18th November 2021.



Simon Levine, Managing Partner