



SLAVERY AND HUMAN TRAFFICKING STATEMENT 2017



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. 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 do not tolerate it either within our business itself or within our supply chain.

OUR ORGANISATION STRUCTURE

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. Further information about the DLA Piper global law firm can be found on our website by [clicking here](#).

DLA Piper is a professional services business, which predominantly employs professionally qualified and highly skilled people. Our supply chain consists of goods and services procured to enable our people to deliver these services, principally professional services and consultancy, property, facilities management, human resources, information technology and marketing. We continue consider the risk of Modern Slavery occurring within our business and supply chain to be low.

OUR POLICIES

DLA Piper is committed to being a responsible business and is a signatory to the United Nations Global Compact (“UNGC”). As part of our commitment to the UNGC we produce an annual ‘Communication on Progress’ against the UN Global Compact ten universal principles and broader UN development goals, the latest published version can be found on our website by [clicking here](#).

Our Human Rights & Modern Slavery Policy (“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.

We comply with all applicable employment law relating to employee terms and conditions, including pay, and in the last 12 months have been accredited as a Living Wage Employer by the [Living Wage Foundation](#). The firm is committed to the following core values in connection with our people:

- we value diversity and respect for the individual;
- we believe in teamwork for the good of the firm and our clients; and
- we believe in the development of all our people and rewarding achievement fairly.

The ‘People’ pillar of DLA Piper’s Global Strategy articulates our commitment to develop the capability of our people and help them to realise their potential by achieving a consistently high standard in managing, training and supporting them and developing their careers.

Other policies which contribute to and support our approach to the identification and prevention of modern slavery in our business include:

- **Diversity and inclusion policy:** encourages all our people to value diversity and respect each person’s individuality, and to ensure that no partner, employee, agency worker, contractor, self-employed consultant, job applicant or ex-employee, client or third party receives less favourable treatment on the basis of colour, race, nationality, ethnic or national origins, sexuality or gender, disability age nor religion or belief.

- **Ethics policy:** embodies the key ethical obligations of the firm and our people and is all 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 would include modern slavery.
- **Anti bribery and corruption policy:** setting out the firm's rules and what is expected of all our people, we expect the same standard of conduct to the firm's contractors and third party service providers in all dealings with us on our behalf.

OUR SUPPLY CHAINS AND DUE DILIGENCE PROCESSES

DLA Piper expects our suppliers to adopt the same high standards that we adhere to and have fair employment practices. This is reflected in our Sustainable Procurement Policy and Ethical Code of Conduct with which we expect our suppliers to comply. The Ethical Code of Conduct specifically requires, amongst other things, that our suppliers ensure their employment is freely chosen, child labour shall not be used, living wages are paid and working hours are not excessive.

Our principal third party suppliers are businesses which supply services related to the running of our premises (such as cleaners, caterers and security), IT and technology, stationery and supplies, and professional services needed to delivery our legal services to clients.

To initiate the process of identifying and assessing any actual or potential involvement in modern slavery in our supply chain our international procurement team have categorised suppliers according to factors that might indicate a high risk of modern slavery, including the location from which services are provided or goods are manufactured and the sectors or activities which present a high risk of modern slavery. To do this we have drawn on internal and independent external human rights expertise and sought to involve meaningful consultation with relevant stakeholders. We have applied this

method to supplier data captured by our international procurement team and will continue to build on this to gain visibility further into our supply chain.

Key suppliers to DLA Piper also submit information about themselves via an on-line portal, to which questions have been added to assess a commitment to operating a fair and ethical workplace and identifying potential issues relating to modern slavery. Our Procurement team can use this data to assess risk and inform decisions when selecting suppliers.

Our standard contract terms contain a clause by which suppliers 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. We also reserve the right to terminate agreements with immediate effect where the supplier commits a material breach. Breach of the clause dealing with modern slavery is separately identified as grounds for termination.

DLA Piper also has formal relationships with other law firms around the world in countries where the DLA Piper global law firm does not have an office. These "relationship firms" are not part of the DLA Piper global law firm (see our organisation structure above) but details about them can be found on our website by [clicking here](#). Due diligence was undertaken on these firms prior to the relationships being formalised, all are regulated professional firms in the countries where they do business and are committed to high ethical standards under the various agreements between them and DLA Piper.

PERFORMANCE INDICATORS

We have identified that the parts of our business and supply chain that carry a potential risk of modern slavery are predominantly those which involve smaller suppliers providing goods and services outside the UK. The steps we are taking to assess and manage these risks are outlined in this statement.

We formally meet with each of our key suppliers at least annually. The frequency of these meetings is dictated by a number of factors, including consideration of the risks posed by involvement in modern slavery. Our standard contract terms contain a contractual right to audit our suppliers.



TRAINING

In relation to modern slavery, we have begun integrating findings from our assessment, referenced above, across internal functions and processes. This includes by raising awareness and understanding of potential risks and how to manage those risks across relevant business functions, specifically our risk, compliance, central procurement and responsible business teams.

During the last 12 months we have developed and delivered appropriate training on modern slavery risk to the key teams and individuals within the firm who are responsible for procuring goods and services and managing suppliers. This training deals with how to identify high risk areas, and suppliers and how to manage potential issues. Based on engagement with key stakeholders the training will be updated to reflect the specific needs of our sector.

We are also developing suitable training solutions on business and human rights for the generality of our people relevant to their role and function, and for the future induction of those joining our firm.

BOARD APPROVAL

The DLA Piper Board approved this statement on behalf of the members on 23 November 2017.



Simon Levine, Managing Partner

www.dlapiper.com

DLA Piper is a global law firm operating through various separate and distinct legal entities. Further details of these entities can be found at www.dlapiper.com.

This publication is intended as a general overview and discussion of the subjects dealt with, and does not create a lawyer-client relationship. It is not intended to be, and should not be used as, a substitute for taking legal advice in any specific situation. DLA Piper will accept no responsibility for any actions taken or not taken on the basis of this publication. This may qualify as "Lawyer Advertising" requiring notice in some jurisdictions. Prior results do not guarantee a similar outcome.

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RESPONSIBLE BUSINESS

At DLA Piper we are committed to contributing to the wellbeing of communities around the world. We encourage our lawyers to do pro bono work that is meaningful, impactful and supports those in need. Our lawyers work with individuals, NGOs and intergovernmental organizations to support access to justice and the protection and promotion of the rule of law around the world.

New Perimeter, our non-profit foundation, provides pro bono legal assistance in under-served regions across the globe to support social and economic development and sound legal institutions.

We are proud to be one of the first law firms subscribing to the United Nations Global Compact (UNGC) and its ten universal principles around human rights, labour, environment and anti-corruption. Our most recent Communication on Progress can be found [here](#).