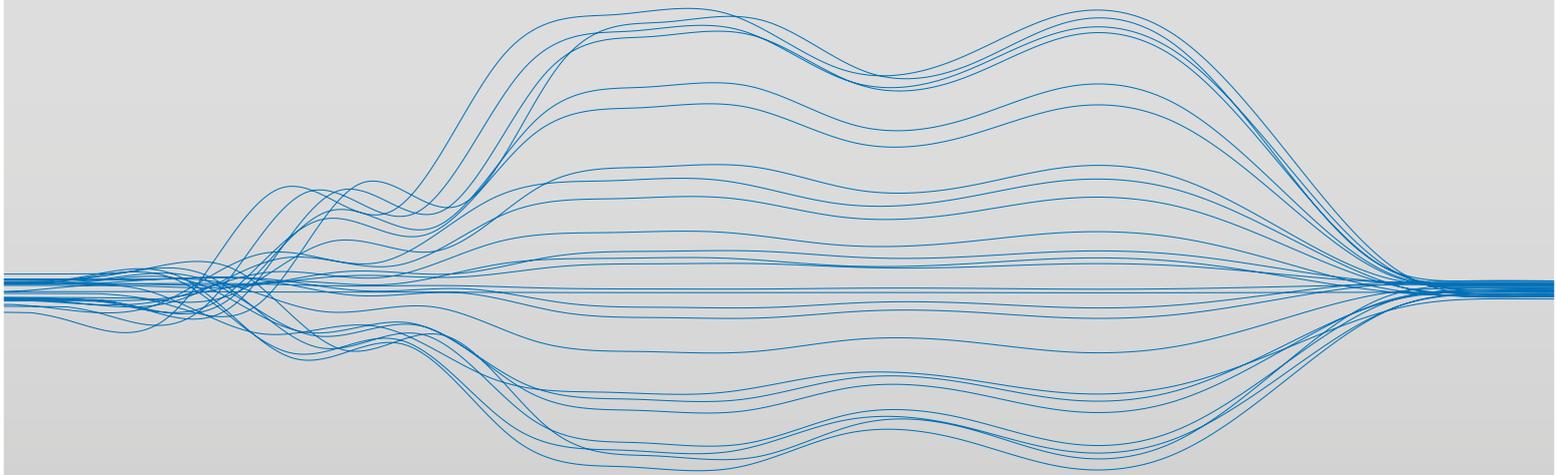


# Slavery and human trafficking statement 2020



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 2020. 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 itself 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; and
- 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. 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](#).

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. 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 due diligence process is 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. The terms of reference

for the Working Group have been updated to ensure that we take a coordinated approach across the firm which remains fit for purpose. In the last 12 months we have refreshed the workplan to take account of the update to the Sustainable Procurement Policy, the development and implementation of the new Supplier Code of Conduct, and the most recent supply chain environmental, social and governance (“ESG”) risk assessment. 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 since the last Slavery and Human Trafficking Statement.

## 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 modern slavery and human trafficking risks in our business. 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.
- **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 or religion or belief.
- **Ethics Policy:** embodies the key ethical obligations of the firm and our people and 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 would include 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.
- **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 in the last year been updated to more closely align with ISO20400 sustainable procurement standards.
- **Supplier Code of Conduct:** sets out our expectations of Third Parties providing goods and services to DLA Piper. 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.

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. It offers all of our people access to support, training and resources, and access to free and confidential advice and assistance on matters which include workplace concerns or issues, delivered internally and by independent third-party providers.

## 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 generally 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 instances of modern slavery by including, amongst other things, that our suppliers ensure that employment with them is freely chosen, child labour shall not be used, living wages are paid and working hours are not excessive.

### IN THE LAST 12 MONTHS WE HAVE:

- developed a new Supplier Code of Conduct ("CoC"). This outlines expectations for suppliers across a range of ESG areas, including modern slavery and human rights. The CoC will be published on our website by end of 2020, and all targeted suppliers will be expected to adhere to it, and to sign off on the updated Sustainable Procurement Policy, regardless of risk tiering; and
- undertaken a supply chain ESG risk assessment, utilising a risk based approach to identify "higher risk" suppliers. These suppliers have been targeted with enhanced due diligence and on-going review.

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

The Sustainable Procurement Working Group's workplan for 2020/2021 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 a review of contract terms, of RFP processes and purchase order terms, and the development of the firm's approaches to risk assessment, supplier due diligence, and supplier monitoring.

## Risk assessment and management

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. The steps we are taking to assess and manage these risks are outlined in this statement. We recognise that COVID-19 has and will impact on the risks of modern slavery in a range of sectors, and we have undertaken and will continue to update such assessments and steps on an annual basis as is necessary to address this and other emerging risks.

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.

We have also included specific questions in the request for proposals in relation to tenders for new office and refurbishment projects. Clauses are then included in the contracts for the procurement of goods and services in relation to these projects.

Over the last 12 months, we have further developed the use of our branded goods portal, where suppliers have been able provide chain of custody assurance that the goods sourced were not exposed to modern slavery. We continue to work on gaining further visibility across our office and enhance alignment between procurement practices across the firm.

DLA Piper has a whistleblowing facility that provides a confidential mechanism for individuals to disclose suspicions of impropriety. In preparation for EU Whistleblower Protection Directive which comes into force in December 2021, a project is underway to review and update the firm's whistleblowing policy, procedure, and processes. The receipt and management of disclosures related to modern slavery, from both internal and external stakeholders, will be an express consideration in the design of the new solution.

## Performance indicators

Our cross-functional Sustainable Procurement Working Group has held quarterly meetings to ensure progress in implementing our strategy and continuous review of priorities and performance. New key performance indicators have been set for the following:

- 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 contract that include relevant clauses on environmental, labour, and human rights requirements; and
- the percentage of our people with procurement responsibilities across all locations who have received training on the Modern Slavery Act/sustainable procurement.

In relation to supplier engagement, the frequency of these 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.

## Training

All members of the Procurement team undertake mandatory training on modern slavery and human trafficking. In the last 12 months the firm's training has been updated to incorporate references to the new Sustainable Procurement Policy, Supplier Code of Conduct and other enhancements to the firm's approach. All relevant personnel are required to complete this training, and a new key performance indicator has been set for compliance. Since the summer of 2020 the topic of sustainable procurement has been integrated into the firm's new starter induction presentation.

All the firm's people are required to undertake mandatory training on relevant policies identified above, and assurances on compliance is obtained via the firm's annual Compliance & Professional Indemnity Declaration.

## 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 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 UNGC Communication on Progress is [published on our website](#).

### Board approval

The DLA Piper Board approved this statement on behalf of the members on 25 November 2020.



**Simon Levine**  
Managing Partner